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13 Attorneys for Plaintiff Barbara Indio.

14 **THE UNITED STATES DISTRICT COURT FOR THE**  
15 **EASTERN DISTRICT OF CALIFORNIA**

16 Barbara Indio, an individual.

17 Plaintiff,

18 vs.

19  
20 WYETH, INC. (f/k/a AMERICAN  
21 HOME PRODUCTS; WYETH  
22 PHARMACEUTICALS (f/k/a  
23 WYETH-AYERST  
24 PHARMACEUTICALS); WYETH  
25 LLC; PHARMACIA & UPJOHN  
26 COMPANY, LLC; PHARMACIA &  
27 UPJOHN LLC; PHARMACIA  
CORPORATION; PFIZER, Inc. and  
DOES 1 through 100, Inclusive,

Case No. 1:10-CV-00295-OWW-DLB

**STIPULATION AND ORDER TO  
EXTEND ALL DEADLINES FOR  
60 DAYS**

Courtroom: 3  
Judge Oliver W. Wanger

[Filed concurrently with Declaration of  
Richard L. Kellner in support thereof]

1 (hereinafter Defendants)

2 Defendants.

3  
4 Through this Stipulation, and for the reasons set forth below, Plaintiff  
5 Barbara Indio (“Plaintiff”) and defendants Wyeth Inc. et. al. (“Defendants”)  
6 (together referred to as the “Parties”) stipulate to the extension of their expert  
7 disclosure deadlines, pursuant to Federal Rule of Civil Procedure 26(a)(2)(B), and  
8 all other deadlines set by this Court by 60 days:

9 WHEREAS, Plaintiff’s expert disclosure deadline is currently due on  
10 November 10, 2010;

11 WHEREAS, the depositions of Dr. Annapurna Reddy M.D, Dr. Chieh Tsai  
12 M.D. and Dr. Robert Small M.D. have yet to be confirmed and scheduled;

13 WHEREAS, the deposition testimonies of Dr. Annapurna Reddy M.D., Dr.  
14 Chieh Tsai M.D. and Dr. Robert Small M.D. are needed for Plaintiff’s experts to  
15 be able to fully and properly comply with the requirements as set forth under Fed.  
16 R.Civ. P. 26;

17 It is hereby stipulated by the Parties that:

18 The deadline for Plaintiff to disclose all experts and to fully comply with  
19 Fed. R.Civ. P. 26 shall be continued from November 10, 2010 to January 10, 2011.

20 The deadline for Defendants to disclose all experts and to fully comply with  
21 Fed. R.Civ. P. 26 shall be continued from December 10, 2010 to February 10,  
22 2011.

23 The deadline for Plaintiff to submit rebuttal expert reports shall be  
24 continued to March 10, 2011.

25 The deadline for Defendant to submit rebuttal expert reports shall be  
26 continued to April 11, 2011.  
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1 The fact discovery cut off shall be extended to December 30, 2010.  
2 The expert discovery cut off shall be extended to May 11, 2011.  
3 The deadline to file dispositive motions shall be extended to June 10, 2011.  
4 The pretrial conference shall be continued from June 20, 2011 to  
5 July 25, 2011.  
6 The trial date shall be continued from August 2, 2011 to September 7, 2011.

8 Dated: November 10, 2010 By: /s/ Richard L. Kellner, Esq.  
9 Richard L. Kellner, Esq.  
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12 Los Angeles, CA 90017  
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15 *Attorneys for Plaintiff Barbara Indio*

16 Dated: November 10, 2010 By: /s/ Wendy S. Dowse, Esq.  
17 Wendy Dowse Esq.  
18 KAYE SCHOLER LLP  
19 *Attorneys for Pfizer Inc, Pharmacia &*  
20 *Upjohn Company LLC and Wyeth LLC*

21 IT IS SO ORDERED.

22  
23 Dated: November 12, 2010 /s/ Oliver W. Wanger  
24 UNITED STATES DISTRICT JUDGE  
25  
26  
27  
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