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6 Attorneys for Defendant Boston Scientific Corporation

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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT

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11 PAMELA COLEMAN, an individual,) Case No. 1:10-CV-01968-OWW-SKO
12 Plaintiff,) Judge: Hon. Oliver W. Wanger
13 vs.) Dept.: 3
14 BOSTON SCIENTIFIC) **STIPULATION AND JOINT**
CORPORATION, a Massachusetts) **REQUEST TO CONTINUE**
15 corporation, and DOE) **SCHEDULING CONFERENCE**
16 MANUFACTURERS one through one) **AND ORDER**
hundred,)
17 Defendants.) Complaint filed: 10/20/2010
Trial Date: None set

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21 TO THE COURT AND ALL ATTORNEYS OF RECORD:

22 Plaintiff Pamela Coleman and Defendant Boston Scientific Corporation
23 (“BSC”), by and through their counsel of record, stipulate to and jointly request a
24 continuance of the Scheduling Conference based on the following:

- 25 1. The Court scheduled a Scheduling Conference for July 22, 2011. (*See*
26 Court’s April 12, 2011 Minute Order, Doc. No. 26.)
27 2. BSC was served with the first amended complaint on or about June 17,
28 2011.

1 3. On July 7, 2011, BSC moved to dismiss this action. (*See* Doc. No. 34.)
2 Defendant's motion is scheduled to be heard in this Court on August 15, 2011 at
3 10:00 a.m.

4 4. All parties have agreed and respectfully request that the Scheduling
5 Conference be continued to August 26, 2011, or to a date preferred by this Court, in
6 order for Defendants' Motion to Dismiss and Plaintiffs' Opposition thereto to be
7 considered.

8 5. There is good cause to continue the scheduling conference until after the
9 Court issues a ruling on BSC's motion to dismiss.

10 IT IS HEREBY STIPULATED, subject to the approval of the Court, that the
11 Scheduling Conference currently set for July 22, 2011, be continued to August 26,
12 2011, or a date more convenient for the Court.

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14 Dated: July 11, 2011

Respectfully Submitted,
SHOOK, HARDY & BACON L.L.P.

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17 By: /s/ Natasha L. Mosley
18 Darolyn Y. Hamada
19 Natasha L. Mosley
 Attorneys for Defendant
 Boston Scientific Corporation

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21 Dated: July 11, 2011

GIARDI KEESE

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23 By: /s/Amanda Kent
24 (authorized on July 11, 2011)
25 Thomas V. Girardi
26 Amy F. Solomon
27 Michael Kowsari
 Amanda Kent
 Attorneys for Plaintiff

1 The Scheduling Conference scheduled for July 22, 2011, is hereby continued to
2 August 26, 2011.

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6 IT IS SO ORDERED.

7 Dated: July 11, 2011

/s/ Oliver W. Wanger
UNITED STATES DISTRICT JUDGE