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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

10 KAREN REYNOLDS and DELMAR SCOTT)
REYNOLDS,)

11 Plaintiffs,)

12 v.)

13)
14 BRISTOL-MYERS SQUIBB COMPANY,)
OTSUKA PHARMACEUTICAL CO., LTD.,)
15 and OTSUKA AMERICA)
16 PHARMACEUTICAL, INC.,)

17 Defendants.)
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Case No. 1:16-cv-00357-LJO-BAM

**STIPULATION TO CONTINUE
BRIEFING ON DEFENDANT OTSUKA
PHARMACEUTICAL CO., LTD.’S
MOTION TO DISMISS PLAINTIFFS’
COMPLAINT FOR LACK OF PERSONAL
JURISDICTION AND ORDER**

Complaint Filed: 3/10/2016

1 This stipulation in the above-captioned matter is made by and between the attorneys for
2 Plaintiffs Karen Reynolds and Delmar Scott Reynolds (“Plaintiffs”) and Defendant Otsuka
3 Pharmaceutical Co., Ltd. (“Defendant”).

4 WHEREAS, Defendant filed a motion to dismiss Plaintiffs’ Complaint for lack of personal
5 jurisdiction under Federal Rule of Civil Procedure 12(b)(2) (ECF 19), to which Plaintiffs filed an
6 opposition (ECF 27), and in further support of which Defendant filed a reply (ECF 39); and

7 WHEREAS, Defendant and Plaintiffs stipulated to continue the hearing date on Defendant’s
8 motion to permit jurisdictional discovery and supplemental briefing (ECF 40); and

9 WHEREAS, in light of said stipulation, the Court entered an order vacating the scheduled
10 hearing date and permitting Plaintiffs to submit a supplemental opposition by July 12, 2016 and
11 Defendant to submit a supplemental reply by July 19, 2016, after which filings the Court would take
12 the matter under submission on the papers (ECF 41); and

13 WHEREAS, on June 24, 2016, the parties to this case and 25 other similar cases pending in
14 federal courts nationwide filed a Joint Motion to Transfer before the Judicial Panel on Multidistrict
15 Litigation to transfer all of the pending cases into a multidistrict litigation; and

16 WHEREAS, on June 29, 2016, all defendants in this case filed an unopposed motion to stay
17 proceedings pending a decision by the Judicial Panel on Multidistrict Litigation on the Joint Motion
18 to Transfer (ECF 45); and

19 WHEREAS, the motion to stay is noticed for hearing on July 28, 2016 (ECF 45);

20 IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the parties
21 hereto, that the Court should continue the supplemental briefing deadlines currently scheduled for
22 July 12, 2016 (Plaintiffs) and July 19, 2016 (Defendant) to August 18, 2016 (Plaintiffs) and August
23 25, 2016 (Defendant), respectively, to permit resolution first of the motion to stay.

24 This is the parties’ first request to continue the briefing dates on Defendant’s Motion to
25 Dismiss Plaintiffs’ Complaint for Lack of Personal Jurisdiction. The parties previously requested to
26 continue the hearing date and to permit supplemental briefing on the motion. All parties agree to
27 this stipulation, and the stipulation does not affect any other previously scheduled dates.

28 IT IS SO STIPULATED.

1 Dated: July 8, 2016

WINSTON & STRAWN LLP

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3 By: /s/ Krista M. Enns

Krista M. Enns

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1 Dated: July 8, 2016

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16 KAREN REYNOLDS AND DELMAR SCOTT
17 REYNOLDS

18 IT IS SO ORDERED.

19 Dated: July 11, 2016

20 /s/ Lawrence J. O'Neill
21 UNITED STATES CHIEF DISTRICT JUDGE