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6 NOVARTIS AG

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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

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11 Kristi Lauris, Individually and as Successor In  
Interest to the Estate of Dainis Lauris;  
12 Kristi Lauris as Guardian ad Litem for L.L.;  
and Taylor Lauris,

13 Plaintiffs,

14 v.

15 Novartis AG, a Global Healthcare Company;  
16 Novartis Pharmaceuticals Corporation, a  
Delaware Corporation,

17 Defendants.  
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Case No. 1:16-cv-00393-LJO-SAB

**SECOND STIPULATION AND ORDER  
FOR EXTENSION OF TIME FOR  
NOVARTIS AG TO RESPOND TO  
COMPLAINT**

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1 Pursuant to Local Rule 144, Plaintiffs Kristi Lauris, individually and as successor in  
2 interest to the Estate of Dainis Lauris, Kristi Lauris as Guardian ad Litem for L.L., and Taylor  
3 Lauris (collectively "Plaintiffs") and Defendant Novartis AG hereby stipulate and request that  
4 Novartis AG have a 14-day extension of time to respond to the Complaint in this action. The  
5 reason for this request is that Plaintiffs plan to file an amended complaint, obviating the need to  
6 respond to the original Complaint. The parties have previously extended until May 31 Novartis  
7 AG's time to move, answer, or otherwise respond to the Complaint. (ECF No. 16.) In the event  
8 that Plaintiffs do not file an Amended Complaint by May 31, Novartis AG's time shall be  
9 extended to and include June 14, 2016.

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11 Dated: May 27, 2016

MORRISON & FOERSTER LLP

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13 By: /s/ Julie Y. Park  
14 Julie Y. Park

15 Attorneys for Defendant  
16 NOVARTIS AG

17 Dated: May 27, 2016

ELIAS GUTZLER SPICER LLC

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19 By: /s/ Richard M. Elias (as authorized on 5/27/16)  
Richard M. Elias

20 Attorneys for Plaintiffs  
21 Kristi Lauris, Individually and as Successor In  
22 Interest to the Estate of Dainis Lauris, Kristi  
Lauris as Guardian ad Litem for L.L., and  
Taylor Lauris

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24 IT IS SO ORDERED.

25 Dated: May 27, 2016

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UNITED STATES MAGISTRATE JUDGE