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11 *Attorneys for Defendants BioLife Plasma Services L.P.*
and Takeda Pharmaceuticals U.S.A., Inc.

12 [Additional Counsel Listed on Signature Page]
 13

14 UNITED STATES DISTRICT COURT
 15 FOR THE EASTERN DISTRICT OF CALIFORNIA
 16

17 EVAN WOOTEN, individually and on behalf
 18 of all others similarly situated,

19 Plaintiff,

20 v.

21 BIOLIFE PLASMA SERVICES L.P. and
 22 TAKEDA PHARMACEUTICALS U.S.A.,
 INC.,

23 Defendants.
 24

Civil Case No.: 1:25-cv-00099-KES-SKO

**STIPULATION AND UNOPPOSED MOTION
 TO EXTEND DEFENDANTS' TIME TO
 RESPOND TO COMPLAINT; ORDER**

(Doc. 11)

1 Pursuant to Civil L.R. 143, Defendants BioLife Plasma Services L.P. and Takeda Pharmaceuticals
2 U.S.A., Inc., along with Plaintiff Evan Wooten, respectfully submit the following joint stipulation
3 enlarging the time for Defendants to respond to the Complaint.

4 **STIPULATION**

5 WHEREAS, Plaintiff filed the Complaint in this action on January 22, 2025 (*see* Dkt. 1);

6 WHEREAS, Defendants were each served with Plaintiff's Complaint on January 24, 2025;

7 WHEREAS, pursuant to Federal Rule of Civil Procedure 12, Defendants' original deadline to
8 respond to the Complaint was February 14, 2025;

9 WHEREAS, pursuant to Civil L.R. 144(a), which allows the parties to stipulate in writing without
10 court order to extend a defendant's time within which to answer or otherwise respond to a complaint by
11 no more than twenty-eight (28) days, the parties previously stipulated to extend Defendants' deadline to
12 respond to the Complaint by twenty-eight (28) days to March 14, 2025 (*see* Dkt. 10);

13 WHEREAS, the parties agree that an additional extension of Defendants' time to respond would
14 be productive and useful given the complexity of the legal and factual issues raised by Plaintiff's
15 complaint;

16 WHEREAS, the parties have conferred and agree that Defendants' deadline to respond to the
17 Complaint shall be extended by an additional twenty-one (21) days to April 4, 2025;

18 WHEREAS, this request is made in good faith and not for the purpose of unnecessary delay;

19 **NOW, THEREFORE, THE PARTIES HEREBY STIPULATE** that Defendants BioLife
20 Plasma Services L.P. and Takeda Pharmaceuticals U.S.A., Inc.'s deadline to answer or otherwise respond
21 to Plaintiff's Complaint is extended to **April 4, 2025**.

1 DATED: March 7, 2025

COVINGTON & BURLING LLP

2 By: /s/ Cortlin H. Lannin

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*Attorneys for Defendants BioLife Plasma Services
L.P. and Takeda Pharmaceuticals U.S.A., Inc.*

14
15 DATED: March 7, 2025

BURSOR & FISHER, P.A.

16 By: /s/ Joshua B. Glatt (as authorized on
17 03/07/2025)

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ORDER

Based on the parties' stipulation and unopposed motion (Doc. 5), and for good cause shown, IT IS HEREBY ORDERED that Defendants BIOLIFE PLASMA SERVICES L.P. and TAKEDA PHARMACEUTICALS U.S.A., INC., shall file their pleadings responsive to Plaintiff Evan Wooten's Complaint (Doc. 1) on or before April 4, 2025.

IT IS SO ORDERED.

Dated: March 7, 2025

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE