

1 Alicia J. Donahue (SBN 117412)
 Amir Nassihi (SBN 235936)
 2 SHOOK, HARDY & BACON L.L.P.
 One Montgomery, Suite 2700
 3 San Francisco, California 94104
 Telephone: (415) 544-1900
 4 Facsimile: (415) 391-0281
adonahue@shb.com
 5 anassihi@shb.com

6 Attorneys for Defendant Pfizer Inc.

7 William F. Wright (SBN 109470)
 Victor X. Bertolani (SBN 146376)
 8 Attorneys At Law
 1731 "J" Street, Suite 250
 9 Sacramento, California 95811
 Telephone: (916) 442-8614
 10 Facsimile: (916) 442-5679
wfwattny@aol.com

11 David A. Valerio (SBN 133568)
 12 Attorney at Law
 P.O. Box 4977
 13 Auburn, California 95604
 Telephone: (916) 401-0369

14 Attorneys for Plaintiff
 15 TRAVIS J. CURRIER

16 UNITED STATES DISTRICT COURT
 17 EASTERN DISTRICT OF CALIFORNIA

18
 19 TRAVIS J. CURRIER, an individual,
 20 Plaintiff,

21 v.

22 STRYKER CORPORATION; STRYKER
 SALES CORPORATION; HOWMEDICA
 23 OSTEONICS CORP, dba STRYKER
 ORTHOPAEDICS, and DOES 1-20,

24 Defendants.
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Case No. 2:11-cv-01203-JAM-EFB

**STIPULATION AND ORDER EXTENDING
 PENDING DATES BY 60 DAYS**

(AS MODIFIED BY THE COURT)

Trial Date: September 30, 2013

1 1. On May 30, 2012, Plaintiff Travis Currier and former Defendants Stryker and
2 Howmedica Osteonics Corp. filed a stipulation allowing Plaintiffs to file an amended complaint as
3 the existing Defendants were incorrectly named. This stipulation was approved by the Court on May
4 31, 2012.

5 2. On July 3, 2012, Plaintiff filed an amended complaint adding newly named defendant
6 Pfizer.

7 3. On August 30, 2012, Pfizer answered Plaintiff's complaint and appeared in this
8 lawsuit.

9 4. On September 19, 2012, Plaintiff dismissed Stryker and Howmedica, leaving Pfizer
10 as the sole defendant in this action.

11 5. Parties have since engaged in written discovery and records collection.

12 6. Parties have sought medical records going back to the early 1990s, when Plaintiff first
13 developed Ewings Sarcoma and required a femoral implant. Parties are close to completing their
14 medical records collection of available medical records.

15 7. Upon completion of parties medical records collection, Pfizer intends to depose
16 Plaintiff, who is unavailable for deposition until March 8, 2013. Plaintiff's deposition is required for
17 parties' experts to formulate their opinions. Following this deposition, Parties anticipate conducting
18 treating physician depositions also.

19 8. Parties are also scheduling a metallurgical inspection of the subject femoral implant
20 and are currently working on a protocol. Parties anticipate completing this inspection in the next 45
21 days.

22 9. As such, Parties hereby stipulate and respectfully request that this Court consider the
23 foregoing as good cause to amend the existing Pre-trial Scheduling Order to continue all pending
24 dates by 60 days, to the following:

25 a.) All dispositive motions shall be filed by August 28, 2013;

1 b.) Hearing on such [dispositive] motions shall be on September 25, 2013 at 9:30 a.m. or
2 as soon thereafter as this Court will permit;

3 c.) All discovery shall be completed by July 8, 2013;

4 d.) The parties shall make expert witness disclosures under Fed. R. Civ. P. 26(a)(2) by
5 May 14, 2013;

6 e.) Supplemental disclosure and disclosure of any rebuttal experts under Fed. R. Civ. P.
7 26(a)(2)(c) shall be made by May 28, 2013;

8 f.) The final pre-trial conference be set for October 25, 2013 at 11:00 a.m.; and

9 g.) Jury trial in this matter be set for December 2, 2013 at 9:00 a.m.
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11

12 Dated: February 11, 2013

ATTORNEYS AT LAW

13
14 By: /s/ Victor Bertolani
15 WILLIAM F. WRIGHT
16 VICTOR X. BERTOLANI

Attorneys for Plaintiff TRAVIS J. CURRIER

17 Dated: February 11, 2013

SHOOK, HARDY & BACON L.L.P.

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19 By: /s/ Amir Nassihi
20 ALICIA J. DONAHUE
21 AMIR NASSIHI

Attorneys for Defendant PFIZER INC.

22 **IT IS SO ORDERED.**
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24

25 DATED: 2/11/2013

/s/ John A. Mendez
26 JOHN A. MENDEZ
27 United States District Court Judge
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