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8 Attorneys for Defendants
 9 ANGELINI PHARMA INC., ANGELINI,
 10 GRUPPO ANGELINI, and ANGELINI
 11 LABOPHARM, LLC (predecessor-by-merger
 12 to Angelini Pharma Inc.)

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF CALIFORNIA**

15 TOBY HENRY,
 16
 17 Plaintiff,
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 19 vs.
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 21 ANGELINI PHARMA INC., et al.,
 22
 23 Defendants.

Case No.: 2:17-cv-2593-TLN-KJN

**STIPULATION AND ORDER
 EXTENDING TIME FOR DEFENDANT
 ANGELINI PHARMA INC. TO FILE
 RESPONSE TO COMPLAINT**

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STIPULATION TO EXTEND TIME TO RESPOND

IT IS HEREBY STIPULATED, by and between Plaintiff Toby Henry (“Plaintiff”) and Defendant Angelini Pharma Inc. (“Pharma”) as follows:

WHEREAS, Plaintiff filed his Complaint for Damages (“Complaint”) in the above captioned action on December 12, 2017;

WHEREAS, Plaintiff’s Complaint and corresponding Summons package was personally served on Pharma on December 26, 2017;

WHEREAS, Plaintiff’s counsel requested that Defendants Angelini, Angelini LaboPharm LLC and Gruppo Angelini (collectively the “Un-served Angelini Defendants”) sign and return Waivers of the Service of Summons (the “Waivers”) in connection with the Complaint, and counsel for the Un-served Angelini Defendants (the same counsel for Pharma) executed and returned such Waivers to Plaintiff’s counsel, on January 11, 2018;

WHEREAS, pursuant to the Waivers, the Un-served Angelini Defendants have until March 12, 2018 (i.e., 60 days from January 11, 2018) to file responses to the Complaint under FRCP Rule 12;

WHEREAS, counsel for Plaintiff and counsel for both Pharma and the Un-served Angelini Defendants are currently engaged in discussions regarding how this action should proceed, and collectively agree Pharma and the Un-served Angelini Defendants should have until the same date, March 12, 2018, to file a response to the Complaint;

WHEREAS Plaintiff, Pharma and the Un-served Angelini Defendants are the only parties affected by this stipulation, and this stipulation will not result in prejudice to any party;

NOW THEREFORE, Plaintiff and Pharma, by and through their counsel of record, hereby stipulate and agree that Pharma should have until March 12, 2018, to file a response to the Complaint under FRCP Rule 12.

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Nothing in this stipulation shall constitute a waiver of any arguments or defenses that Pharma or the Un-served Angelini Defendants may wish to assert in their responsive pleadings, all of which are expressly reserved.

IT IS SO STIPULATED AND AGREED.

Dated: January 12, 2018

Respectfully submitted,
EVERSHEDS SUTHERLAND (US) LLP

By: /s/--Robert P. Merten III
ROBERT P. MERTEN III
Attorneys for Defendants
ANGELINI PHARMA INC., ANGELINI,
ANGELINI LABOPHARM, LLC, and
GRUPPO ANGELINI

Dated: January 12, 2018

LAW OFFICES OF LAWRENCE PAIKOFF

By: /s/--Lawrence S. Paikoff
LAWRENCE S. PAIKOFF
RICHARD J. PAIKOFF
Attorneys for Plaintiff
TOBY HENRY

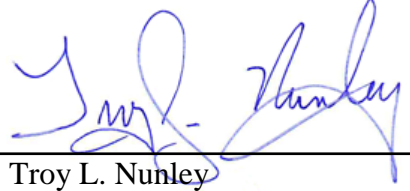
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ORDER

Based upon the foregoing Stipulation and good cause appearing, IT IS HEREBY ORDERED that Defendant Pharma may file its response to the Complaint under FRCP Rule 12 by March 12, 2018, the same date responses to the Complaint are due to be filed from the Un-served Angelini Defendants pursuant to the Waivers.

IT IS SO ORDERED.

Dated: January 22, 2018



Troy L. Nunley
United States District Judge