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6 *Attorneys for Defendant*  
 7 *US WorldMeds LLC*

8 IN THE UNITED STATES DISTRICT COURT  
 9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 10 SACRAMENTO DIVISION

11 UNITED STATES OF AMERICA, the States of  
 12 ARKANSAS, CALIFORNIA, COLORADO,  
 CONNECTICUT, DELAWARE, FLORIDA,  
 13 GEORGIA, HAWAII, IOWA, ILLINOIS,  
 INDIANA, LOUISIANA, MARYLAND,  
 14 MASSACHUSETTS, MICHIGAN,  
 MINNESOTA, MONTANA, NEVADA, NEW  
 15 HAMPSHIRE, NEW JERSEY, NEW MEXICO,  
 NEW YORK, NORTH CAROLINA,  
 16 OKLAHOMA, RHODE ISLAND,  
 TENNESSEE, TEXAS, VERMONT,  
 17 VIRGINIA, WASHINGTON, and the  
 DISTRICT OF COLUMBIA, *ex rel.* THOMAS  
 18 ALAND,

19 Plaintiffs,

20 v.

21 US WORLDMEDS LLC,

22 Defendant.

CASE NO. 2:19-cv-02618-TLN-KJN

**STIPULATION AND ORDER FOR  
 EXTENSION OF TIME FOR  
 DEFENDANT TO RESPOND TO THE  
 COMPLAINT AND FOR BRIEFING  
 SCHEDULE**

Judge: Hon. Troy L. Nunley

Trial Date: None set

Action Filed: December 27, 2019

23 WHEREAS, on December 27, 2019, Relator Thomas Aland (“Relator”) brought suit in this  
 24 Court against Defendant US WorldMeds LLC (“USWM”) by filing a Complaint on behalf of the  
 25 United States of America as well as multiple states;

26 WHEREAS, the United States of America declined to intervene in this action on December 1,  
 27 2022, and the various states declined to intervene in this action on December 2, 2022;  
 28

1 WHEREAS, the Complaint was unsealed on December 5, 2022, and Relator served USWM  
2 with the Complaint on March 6, 2023;

3 WHEREAS, USWM currently intends to respond to the Complaint with a motion to dismiss  
4 pursuant to Federal Rule of Civil Procedure 12;

5 WHEREAS, the parties wish to stipulate to an extension of time for USWM to respond to the  
6 Complaint, and to set a briefing schedule for USWM's motion to dismiss; and

7 WHEREAS, no party has previously sought any extension of time in this action;

8 NOW, THEREFORE, under Local Rules 143 and 144, the parties stipulate to the following  
9 briefing schedule on the USWM's forthcoming motion to dismiss, subject to approval of the Court:

- 10 • May 5, 2023: Deadline for the USWM to file its motion to dismiss (or to answer the  
11 Complaint, should it choose to do that);
- 12 • June 5, 2023: Deadline for Relator to file its opposition to any motion to dismiss;
- 13 • June 20, 2023: Deadline for USWM to file any reply brief in support of any motion to  
14 dismiss;
- 15 • Hearing on any motion to dismiss filed by USWM on August 17, 2023 at 2:00 p.m., or the  
16 next available hearing date convenient for the Court.

17  
18 Dated: March 15, 2023

GIBSON, DUNN & CRUTCHER LLP

19 By: /s/ Benjamin Wagner

20 Benjamin Wagner

21 *Attorneys for Defendant*

22 *US WorldMeds LLC*

23  
24 Dated: March 15, 2023

By: /s/ Richard M. Elias (as authorized on March 15, 2023)

25 Richard M. Elias

26 James D. Weakley

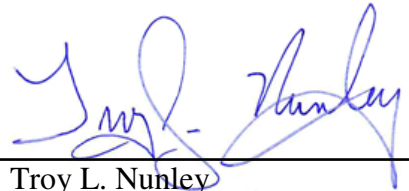
27 *Attorneys for Relator*

28 *Thomas Aland*

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**IT IS SO ORDERED.**

Dated: March 15, 2023



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Troy L. Nunley  
United States District Judge