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6 Attorneys for Defendants  
7 JOHNSON & JOHNSON; JOHNSON &  
JOHNSON HOLDCO (NA) INC.;  
8 JANSSEN PHARMACEUTICALS,  
INC.; KENVUE, INC.; and LTL  
9 MANAGEMENT LLC

10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

12 AFRAA AL EESA, Individually and as  
13 Successor-in-Interest to ABBAS AL  
14 KHALIDI, Deceased, A.A.K., A.A.K., and  
Y.A.K.

15 Plaintiffs,

16 v.

17 JOHNSON & JOHNSON; JOHNSON &  
JOHNSON HOLDCO (NA) INC. f/k/a  
18 JOHNSON & JOHNSON CONSUMER  
INC. (sued individually and as successor-in-  
19 interest to Johnson & Johnson subsidiary  
"Old JJCI"); JANSSEN  
20 PHARMACEUTICALS, INC. (sued  
individually and as successor-in-interest to  
21 Johnson & Johnson subsidiaries named  
JOHNSON & JOHNSON CONSUMER  
22 INC. both prior to and after its 2021  
restructurings and colloquially knows as  
23 "Old JJCI and New JJCI"); KENVUE INC.  
(sued individually and as successor-in-  
24 interest to JOHNSON & JOHNSON  
CONSUMER INC.); LTL  
25 MANAGEMENT LLC; and DOES 1-450,  
inclusive

26 Defendants.  
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Case No. 2:23-cv-02183-MCE-JDP

**JOINT STIPULATION TO EXTEND  
DEFENDANTS' TIME TO RESPOND  
TO PLAINTIFFS' COMPLAINT;  
ORDER**

Complaint Filed: Oct. 2, 2023  
Trial Date: None Set  
Current Rep. Date: Nov. 16, 2023  
Proposed Resp. Date: Dec. 15, 2023

1 Plaintiffs Afraa Al Eesa, Individually and as Successor-in-Interest to Abbas Al  
2 Khalidi, Deceased, A.A.K. (a minor), A.A.K. (a minor), and Y.A.K. (a minor)  
3 (“Plaintiffs”) and Defendants Johnson & Johnson, Johnson & Johnson Holdco (NA) Inc.,  
4 Janssen Pharmaceuticals, Inc., Kenvue Inc., and LTL Management LLC (“Defendants”),<sup>1</sup>  
5 by and through the undersigned counsel, hereby submit this Stipulation pursuant to Local  
6 Rule 144 as follows:

7 1. WHEREAS Plaintiffs filed this Complaint for Wrongful Death and a Survival  
8 Action – Asbestos (“Plaintiffs’ Complaint”) against Defendants on October 2, 2023.  
9 Plaintiffs’ Complaint names five defendants and contains five causes of action and 121  
10 paragraphs;

11 2. WHEREAS the Parties previously agreed that Defendants’ last day respond  
12 to Plaintiffs’ Complaint was extended by 20 or 21 days respectively to November 16, 2023  
13 pursuant to Local Rule 144(a) (Dkt. No. 10); and

14 3. WHEREAS the Parties agree that good cause exists for an additional  
15 extension of time for Defendants to respond to Plaintiffs’ Complaint until December 15,  
16 2023 given the number of parties, the length of Plaintiffs’ complaint, the complexity of the  
17 factual and legal issues presented in Plaintiffs’ Complaint, and the fact that the undersigned  
18 counsel, Julia Romano, is currently in trial.

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27 <sup>1</sup> Upon information and belief, Defendant Johnson & Johnson Consumer Inc. has not yet been  
served with Plaintiffs’ Complaint.

1 DATED: November 13, 2023

Respectfully submitted,

2 By: /s/Julia E. Romano  
3 Alexander G. Calfo  
4 Julia E. Romano  
King & Spalding LLP

5 Attorneys for Defendants  
6 JOHNSON & JOHNSON; JOHNSON &  
7 JOHNSON HOLDCO (NA) INC.;  
8 JANSSEN PHARMACEUTICALS,  
INC.; KENVUE, INC.; and LTL  
MANAGEMENT LLC

9 DATED: November 13, 2023

Respectfully submitted,

10 By: /s/Mark A. Linder  
11 Mark A. Linder  
12 The Lanier Law Firm

13 Attorneys for Plaintiffs  
14 AFRAA AL EESA, INDIVIDUALLY AND  
15 AS SUCCESSOR-IN-INTEREST TO  
16 ABBAS AL KHALIDI, DECEASED,  
17 A.A.K., A.A.K., and Y.A.K.

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**ATTESTATION**

I, Julia E. Romano, am the ECF User whose ID and password are being used to file this Joint Stipulation. I hereby attest that the other signatories to this Joint Stipulation concur in this filing.

DATED: November 13, 2023

Respectfully submitted,

By: /s/Julia E. Romano  
Julia E. Romano

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**ORDER**

The Court, having considered the stipulation submitted herewith, **IT IS SO**

**ORDERED** that:

Defendants Johnson & Johnson, Johnson & Johnson Holdco (NA) Inc., Janssen Pharmaceuticals, Inc., Kenvue Inc., and LTL Management LLC's deadline to respond to Plaintiffs' Complaint in the above-captioned matter is extended to December 15, 2023.

IT IS SO ORDERED.

Dated: November 14, 2023

  
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MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE