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20	UNITED STATES DISTRICT COURT				
-	NORTHERN DISTRICT OF CALIFORNIA				
21	SAN FRANCISCO DIVISION				
22	UNITED STATES <i>ex rel</i> . STROM,	No. C 05-3004 CRB (JSC)			
23	) Plaintiffs,	STIPULATION REGARDING			
24	v. ()	PRODUCTION OF CLAIMS DATA AND EXPERT DISCOVERY			
25	SCIOS, INC. and				
26	JOHNSON & JOHNSON,				
27	Defendants.				
28	//				
	STIPULATION REGARDING PRODUCTION OF CLAIMS DATA AND EXPERT DISCOVERY, No. C 05-3004 CRB (JSC)				

WHEREAS on December 1, 2011, the Court granted Defendants Scios Inc. and Johnson 1 & Johnson's (collectively "Defendants") motion to compel the production of inpatient and 2 outpatient claims data from Medicare, TRICARE, and FEHBP from January 1, 2001 to 3 December 31, 2007 for each patient ID number for which the government alleges a false claim 4 was submitted. (Docket No. 171). 5 WHEREAS at the December 1, 2011 hearing on Defendants' motion to compel, Judge 6 7 Corley instructed the parties to meet and confer in order to reach a stipulation regarding the timing for production of the claims data, and a revised schedule for expert discovery. 8 WHEREAS the parties have met and conferred extensively regarding the timing for 9 production of the claims data, and a revised schedule for expert discovery. 10 WHEREAS the revised schedule for expert discovery set forth below will affect the 11 current dates for dispositive motions. Accordingly, the parties will submit a separate stipulation 12 and order to District Judge Charles R. Breyer regarding dates for dispositive motions and trial, or 13 request a Case Management Conference before him to set such dates. 14 Subject to the Court's approval, IT IS HEREBY STIPULATED AND AGREED by the 15 Parties, through their undersigned counsel of record, that: 16 The United States shall produce the claims data it has been ordered to produce to 1. 17 Defendants no later than February 15, 2012. 18 The parties shall produce rebuttal expert reports no later than May 1, 2012. 2. 19 The United States shall produce rebuttal reports responding to Defendants' experts' 3. 20 discussion of and opinions regarding the claims data no later than June 15, 2012. 21 /// 22 /// 23 /// 24 /// 25 /// 26 /// 27 /// 28

STIPULATION REGARDING PRODUCTION OF CLAIMS DATA AND EXPERT DISCOVERY, No. C 05-3004 CRB (JSC)

1	4. The deadline for completing expert discovery shall be July 31, 2012.			
2	IT IS SO STIPULATED.			
3				Respectfully submitted,
4				TONY WEST Assistant Attorney General
5				JOSHUA B. EATON
6				Attorney for the United States, Acting Under Authority Conferred by 28 U.S.C. §515
7	Dated:	01/03/2012	By:	/S/ Signature on file
8				SARA WINSLOW JULIE A. ARBUCKLE
9				THOMAS R. GREEN Assistant United States Attorneys
10	Dated:	01/03/2012	By:	/S/ Signature on file JOYCE R. BRANDA
11				PATRICIA R. DAVIS RENÉE S. ORLEANS
12				KIMBERLY I. FRIDAY ERICA HITCHINGS
13 14				Civil Division, U.S. Department of Justice Attorneys for the United States
15				NOLAN & AUERBACH, P.A. LAW OFFICES OF MATTHEW PAVONE
16	Dated:	12/31/2011	By:	/S/ Signature on file
17			2	KENNETH J. NOLAN, Esq. MARCELLA AUERBACH, Esq.
18				Pro Hac Vice MATTHEW B. PAVONE, Esq.
19				Attorneys for Qui Tam Plaintiff Joe Strom
20			_	QUINN EMANUEL URQUHART & SULLIVAN, LLP
21	Dated:	01/03/2012	By:	/S/ Signature on file JOHN POTTER, Esq.
22				DIANE DOOLITTLĚ, Esq. NICOLE ALTMAN, Esq. Attorneys for Defendants Scios, Inc. and
23				Johnson & Johnson Inc.
24 25	[P <del>ROPOSE</del> D] ORDER			
25 26	Pursuant to stipulation, IT IS SO ORDERED.			
20	Dated:	January 3, 2012		JACQUELINE SCOTT CORLEY
28				JACQUELINE SCOTT CORLEY United States Magistrate Judge
	STIPULAT	FION REGARDING PRODUCT	ION OF CI	LAIMS DATA AND EXPERT DISCOVERY, No. C 05-3004 CRB (JSC)