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 AstraZeneca Pharmaceuticals LP and AstraZeneca LP

8 UNITED STATES DISTRICT COURT
 9
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12	JAMES FREDERICK; 06-CV-0590-WA)	Assigned to: Hon. William Alsup
)	
13	SAMANTHA GANGIDINE; 06-CV-0643-WA)	STIPULATED REQUEST FOR ORDER
)	SHORTENING TIME PURSUANT TO
14	NED GODFREY; 06-CV-0565-WA)	LOCAL RULE 6-1(b) AND 6-2;
)	DECLARATION OF CHRISTINE KIM
15	LORI ROBINSON; 06-CV-0663-WA)	SON
)	
16	SHARIE WALKER; 06-CV-0587-WA)	{Proposed} ORDER LODGED
17	LUCAS WEBB; 06-0598-WA)	CONCURRENTLY
)	
18)	
	Plaintiffs,)	
19	vs.)	
)	
20	ASTRAZENECA PHARMACEUTICALS, L.P.,)	
21	et al.,)	
)	
22	Defendants.)	

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STIPULATED REQUEST FOR ORDER SHORTENING TIME

1 Pursuant to Local Rule 6-1(b) and 6-2, defendants AstraZeneca Pharmaceuticals LP
2 and AstraZeneca LP, by and through their counsel, respectfully petition the Court for an order
3 shortening time on Defendants' Motion To Vacate Order of Dismissal ("Motion to Vacate").
4 Plaintiffs in the captioned actions hereby stipulate to an order shortening time, and to the briefing
5 schedule proposed by defendants, as follows:

6	Friday, July 21, 2006:	Electronic filing and service of the Motion to Vacate on all parties by 11:59 p.m.
7		
8	Wednesday, August 2, 2006	Electronic filing and service of the Opposition to the Motion to Vacate on all parties by 11:59 p.m.
9		
10	Friday, August 11, 2006:	Electronic filing and service of the Reply in support of Motion to Vacate on all parties by 11:59 p.m.
11		
12	Thursday, August 17, 2006:	Hearing on the Motion to Vacate at 8:00 a.m.

13 This Order to Shorten Time is necessary for the following reasons:

14 Defendants contend that the Court did not have jurisdiction to enter dismissals in
15 these cases and, therefore, the order of dismissal should be vacated, and the cases reopened. These
16 cases are on a transfer order to MDL-1769, and all parties will benefit from an early resolution of
17 this issue.

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Therefore, counsel for the parties hereby stipulate to the hearing date and briefing schedule as set forth above. Furthermore, the parties respectfully request that the Court grant this joint request for an order shortening time.

Dated: July 21, 2006

SIDLEY AUSTIN LLP

By: /s/ Catherine Valerio Barrad

Catherine Valerio Barrad
Attorneys For Defendants
AstraZeneca Pharmaceuticals LP and
AstraZeneca LP

Dated: July 21, 2006

LEVIN SIMES KAISER & GORNICK LLP

By: 

Dennis J. Canty
Attorneys for Plaintiffs

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DECLARATION OF CHRISTINE KIM SON

I, Christine Kim Son, declare:

1. I am an attorney licensed to practice law in the State of California. I am an associate with the law firm of Sidley Austin LLP (“Sidley”), attorneys of record for Defendants AstraZeneca Pharmaceuticals, LP and AstraZeneca LP (collectively, “AstraZeneca”). I am over the age of eighteen and am competent to make this declaration in support of the Stipulated Request For Order Shortening Time. I know the following facts of my own personal knowledge and, if called and sworn as a witness, could and would testify competently.

2. Defendants contend that the Court did not have jurisdiction to enter dismissals in these cases and, therefore, the order of dismissal should be vacated, and the cases reopened. These cases are on a transfer order to MDL-1769, and all parties will benefit from an early resolution of this issue.

3. There have been no other time modifications in this case, whether by stipulation or by Court order.

4. The requested time modification would have no effect on the schedules of the cases, as these cases are currently dismissed without prejudice.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of July, 2006 in Los Angeles, California.


Christine Kim Son

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JAMES FREDERICK; 06-CV-0590-WA) Assigned to: Hon. William Alsup
)
SAMANTHA GANGIDINE; 06-CV-0643-WA) **[Proposed] ORDER SHORTENING TIME**
) **PURSUANT TO LOCAL RULE 6-1(b)**
NED GODFREY; 06-CV-0565-WA) **AND 6-2**
)
LORI ROBINSON; 06-CV-0663-WA)
)
SHARIE WALKER; 06-CV-0587-WA)
)
LUCAS WEBB; 06-0598-WA)
)
Plaintiffs,)
vs.)
)
ASTRAZENECA PHARMACEUTICALS, L.P.,)
et al.,)
)
Defendants.)

1 Pursuant to Local Rule 6-1(b) and 6-2, plaintiffs James Frederick, Samantha
2 Gangidine, Ned Godfrey, Lori Robinson, Sharie Walker, and Lucas Webb, by and through their
3 counsel, and defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP, by and through their
4 counsel, stipulated to a shortened notice period and briefing schedule on defendants' Motion to
5 Vacate Order of Dismissal ("Motion to Vacate").

6 Specifically, the parties stipulated to the following deadlines and hearing date.

7 Friday, July 21, 2006: Electronic filing and service of the Motion to
8 Vacate on all parties by 11:59 p.m.

9 Wednesday, August 2, 2006 Electronic filing and service of the Opposition
10 to the Motion to Vacate on all parties by 11:59
11 p.m.

12 Friday, August 11, 2006: Electronic filing and service of the Reply in
13 support of Motion to Vacate on all parties by
14 11:59 p.m.

15 Thursday, August 17, 2006: Hearing on the Motion to Vacate at 8:00 a.m.

16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17 Dated: July 26, 2006



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19 By: _____
20 United States District Court Judge