

1 John R. Climaco (Ohio #0011456)  
jrclim@climacolaw.com  
2 Lisa Ann Gorshe (MN #029522X)  
lagorsta@climacolaw.com  
3 CLIMACO, LEFKOWITX, PECA,  
WILCOX & GAROFOLI, CO., LPA  
4 55 Public Square, Suite 1950  
Cleveland, OH 44113  
5 Telephone: (216)621-8484  
Facsimile: (216)771-1632  
6

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

\_\_\_\_\_)  
)  
IN RE: BEXTRA AND CELEBREX )  
MARKETING SALES PRACTICES AND )  
PRODUCT LIABILITY LITIGATION )  
\_\_\_\_\_)

**MDL NO. 1699**  
**District Judge: Charles R. Breyer**

This Document Relates to:

Nanji Ladva, et al. v. Pfizer, Inc., et al.  
(C 07 1262 CRB)

**STIPULATION AND ORDER OF  
DISMISSAL OF PLAINTIFFS WITH  
PREJUDICE**

20  
21  
22  
23  
24  
25  
26  
27  
28

Come now all remaining Plaintiffs in these actions, including, Nanji and Sumita Lavda and Defendants, by and through the undersigned attorneys, pursuant to Federal Rule of Civil Procedure, Rule 41(a), and hereby stipulate to the dismissal of these actions with prejudice, with each side bearing its own attorneys' fees and costs.


- 1 -

**STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE**

Case No. MDL NO. 1699

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: November 30, 2009


By: 

John R. Climaco (Ohio #0011456)  
[jrc@climacolaw.com](mailto:jrc@climacolaw.com)  
Lisa Ann Gorshe (MN #029522X)  
[lagors@climacolaw.com](mailto:lagors@climacolaw.com)  
CLIMACO, LEFKOWITX, PECA,  
WILCOX & GAROFOLI, CO., LPA  
55 Public Square, Suite 1950  
Cleveland, OH 44113  
Telephone: (216)621-8484  
Facsimile: (216)771-1632

*Attorneys for Plaintiffs*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: Dec. 14, 2009

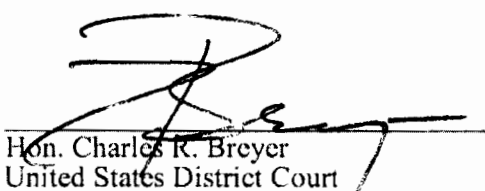
By:  \_\_\_\_\_

DLA PIPER LLP (US)  
1251 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 335-4500  
Facsimile: (212) 335-4501

*Defendants' Liaison Counsel*

**PURSUANT TO THE TERMS SET FORTH IN THE PARTIES' STIPULATION,  
IT IS SO ORDERED.**

DATED: **DEC 18**, 2009

  
\_\_\_\_\_  
Hon. Charles R. Breyer  
United States District Court