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14 Counsel for Plaintiff

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION
 17

18 PETER BATCHKOFF on behalf of himself and
 19 others similarly situated,

20 Plaintiff,

21 v.

22 BOEHRINGER INGELHEIM
 23 PHARMACEUTICALS, INC.,

24 Defendant

Case No. C10-4830-EDL

**STIPULATION TO CONTINUE INITIAL
 CASE MANAGEMENT CONFERENCE
 AND RELATED DEADLINES;
 [PROPOSED] ORDER THEREON**

Complaint Filed: September 24, 2010
 Trial Date: None Set

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 STIPULATION TO CONTINUE INITIAL CASE
 MANAGEMENT CONFERENCE; [PROPOSED] ORDER

Batchkoff v. Boehringer Ingelheim Pharmaceuticals, Inc.
 USDC-Northern Case No. C 10-4830EDL

1 a second amended notice setting the Initial Case Management Conference for February 9, 2011 at
2 4:00 PM.

3 6. The Parties agree that postponement of the currently scheduled ADR deadlines,
4 Rule 26(f) deadline, and Initial Case Management Conference until after the hearing on the
5 motion to coordinate and consolidate this case with the three above-named cases would avoid
6 potentially unnecessary attorneys fees and costs, increase judicial efficiency and is in the interests
7 of justice.

8 **STIPULATION**

9 The Parties, in light of the recitals detailed above, stipulate and agree to continue the
10 currently scheduled deadlines until approximately thirty days after the January 27, 2011 hearing
11 on the pending motion to coordinate and consolidate to the following dates or as soon thereafter
12 as the Court will permit:

13 **January 11, 2011** deadline to meet and confer regarding early settlement, ADR
14 process selection, and discovery plan be rescheduled to **March 1, 2011**;

15 **January 25, 2011** deadline to file a Rule 26(f) report and complete initial
16 disclosures be rescheduled to **March 15, 2011**;

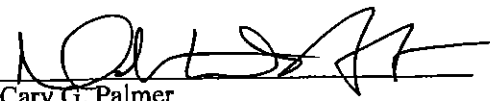
17 **February 9, 2011** Initial Case Management Conference be rescheduled to **March**
18 **22, 2011**.

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Date: January 6, 2011

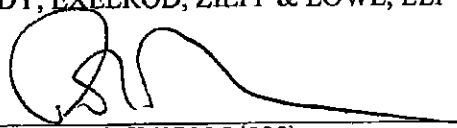
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By: 
Cary G. Palmer
Nathan W. Austin

Attorneys for Defendant
BOEHRINGER INGELHEIM
PHARMACEUTICALS, INC

Date: 1/6, 2011

RUDY, EXELROD, ZIEFF & LOWE, LLP

By: 
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John T. Mullan

Attorneys for Plaintiff

IT IS SO ORDERED.

Dated: January 7, 2011


Judge Elizabeth D. LaPorte