Health Care Service Corporation v. Brown et al

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7	UNITED STATES DIS	PDICT COUDT	
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11	IN RE: BEXTRA AND CELEBREX MARKETING SALES PRACTICES AND	Master Case No. 05-CV-01699 CRB Individual Case No. 11-CV-00310 CRB	
12	PRODUCT LIABILITY LITIGATION	MDL No. 1699	
13	This Document Relates To:	STIPULATION AND [TROPOSED]	
14 15	HEALTH CARE SERVICE CORPORATION, a	ORDER EXTENDING TIME FOR DEFENDANTS TO FILE MOTION	
	MUTUAL LEGAL RESERVE COMPANY,	TO DISMISS PLAINTIFF'S SECOND AMENDED COMPLAINT	
16 17	Plaintiff,		
17	v.		
18	PHARMACIA & UPJOHN, INC., and PFIZER, INC.,		
19 20	Defendants.		
20			
21	WHEREAS Plaintiff filed a Second Amended	Complaint ("SAC") on April 23, 2012.	
22 23	WHEREAS Plaintiff filed a Second Amended Complaint ("SAC") on April 23, 2012;WHEREAS Defendants' deadline to answer or move to dismiss the SAC ordinarily would		
23 24	be May 7, 2012; and		
24 25	WHEREAS the parties agree that the complexity of the legal issues raised in Defendants'		
23 26	anticipated motion to dismiss the SAC warrant additional time for Defendants to complete their		
20 27	brief in support of their motion to dismiss;		
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	STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANTS TO FILE MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED COMPLAINT – 11-CV-00310 CRB		

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THEREFORE, the parties hereby stipulate and respectfully request that the Court extend		
the time for Defendants to file its motion to dismiss the SAC by seven (7) days, to May 14, 2012.		
IT IS SO STIPULATED.		
Dated: April 30, 2012	SCOTT YUNG LLP	
-		
	/s/ Andrew Yung	
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	Telephone: (214) 220-0422 Fax: (214) 220-9932	
	Email: ayung@scottyung.com	
	Counsel for Plaintiff Health Care Service Corporation	
Dated: April 30, 2012	SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP	
	FLOM LLF	
	/s/ John H. Beisner	
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	Counsel for Defendants Pfizer Inc and Pharmacia & Upjohn, Inc.	
PURSUANT TO THE PARTIE	S' STIPULATION, IT IS SO ORDERED.	
Dated: May 1, 2012	STATES DISTRICT CO	
Duted 2012	HONORABISE CHARLES R. BRAVER UNITED SPATES DI ORDERED IGE	
	UNITED SEATES DIG ORDERED CE	
	Z Judge Charles R. Breyer	
	June	
	ERN DISTRICT OF C	
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	RDER EXTENDING TIME FOR DEFENDANTS TO FILE MOTION TO ENDED COMPLAINT – 11-CV-00310 CRB	