

1 (All parties and counsel listed on Signature Page)

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4 UNITED STATES DISTRICT COURT
5 NORTHERN DISTRICT OF CALIFORNIA
6 SAN FRANCISCO DIVISION

6 TAKEDA PHARMACEUTICAL CO., LTD.,
7 TAKEDA PHARMACEUTICALS NORTH
8 AMERICA, INC., TAKEDA
9 PHARMACEUTICALS LLC, AND TAKEDA
10 PHARMACEUTICALS AMERICA, INC.,

11 Plaintiffs,

12 v.

13 HANDA PHARMACEUTICALS, LLC,

14 Defendant.

Case No. 3:11-cv-00840 JCS

**STIPULATION AND [PROPOSED]
ORDER REGARDING POST-MARKMAN
SCHEDULE**

Judge: Hon. Joseph C. Spero
Courtroom G, 15th Floor

15 TAKEDA PHARMACEUTICAL CO., LTD.,
16 TAKEDA PHARMACEUTICALS NORTH
17 AMERICA, INC., TAKEDA
18 PHARMACEUTICALS LLC, AND TAKEDA
19 PHARMACEUTICALS AMERICA, INC.,

20 Plaintiffs,

21 v.

22 ANCHEN PHARMACEUTICALS, INC., AND
23 TWI PHARMACEUTICALS, INC.,

24 Defendants.

Case No. 3:11-cv-01609 JCS

25 TAKEDA PHARMACEUTICAL CO., LTD.,
26 TAKEDA PHARMACEUTICALS NORTH
27 AMERICA, INC., TAKEDA
28 PHARMACEUTICALS LLC, AND TAKEDA
PHARMACEUTICALS AMERICA, INC.,

Plaintiffs,

v.

IMPAX LABORATORIES, INC.,

Defendant.

Case No. 3:11-cv-01610 JCS

1 WHEREAS, the Court issued a Case Management and Pretrial Order on August 29, 2011,
2 setting forth the schedule with respect to Claim Construction;

3 WHEREAS, the Court did not set post-*Markman* dates in its order of August 29, 2011;

4 WHEREAS, at the Claim Construction Hearing on February 16, 2012, the Court directed
5 the parties to agree on a schedule for the remainder of pre-trial events;

6 WHEREAS, the parties, by their undersigned attorneys, hereby stipulate to the following
7 schedule, subject to the approval of the Court:

Event	Date
Document Production Complete for Foreign-Language Documents	Monday, 04/30/12*
Document Production Complete for English-Language Documents	Tuesday, 05/15/12*
Fact Discovery Cut-Off	Friday, 07/27/12
Initial Expert Reports on Issues where party Bears Burden of Proof. Takeda will provide any report on secondary considerations at this time.	Friday, 08/24/12
Rebuttal Expert Reports	Friday, 9/21/12
Expert Discovery Cut-Off	Friday, 10/26/12
Last Day to File Dispositive Motions	Tuesday, 11/20/12
Oppositions Due for Dispositive Motions Filed on November 20, 2012	Friday, 12/21/12
Replies Due for Dispositive Motions Filed on November 20, 2012	Friday, 1/10/13
Motions Hearing	Friday, 02/01/13
Pretrial Conference	Friday, May 17, 2013 at 1:30 PM Thursday, 03/07/13
Trial	June 3, 2013 at 8:30 AM March or April 2013

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25 _____
26 * The agreed-upon dates for the close of document production relate to documents produced in
27 response to the comprehensive requests exchanged by the parties last year. The parties
28 acknowledge that additional Requests for Production that are more narrow in scope, such as
requests seeking individual documents or small populations of documents, may be issued between
now and the close of fact discovery. Furthermore, this agreement is not intended to supersede the
requirements of Rule 34 or other Federal Rules of Civil Procedure.

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DATED: March 21, 2012

Respectfully Submitted,
TAKEDA PHARMACEUTICAL CO., LTD., TAKEDA
PHARMACEUTICALS NORTH AMERICA, INC.,
TAKEDA PHARMACEUTICALS LLC, AND
TAKEDA PHARMACEUTICALS AMERICA, INC.

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: March 26, 2012

THE HONORABLE JUDGE JOSEPH C. SPERO
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
REGISTRAR JUDGE



