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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

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11 CHARO OROSA, an Individual,
 12 Plaintiff,
 13 vs.
 14 THERAKOS INC., a corporation; JOHNSON
 & JOHNSON, INC., a corporation,
 15 Defendant.
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Case No. CV-11-02143 EMC

**STIPULATION AND [PROPOSED]
 ORDER MODIFYING CASE
 MANAGEMENT CONFERENCE AND
 PRETRIAL ORDER FOR JURY
 TRIAL, AS TO DISPOSITIVE
 MOTION AND STATUS
 CONFERENCE DEADLINES**

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19 Plaintiff Charo Orosa (“Plaintiff”) and Defendants Therakos, Inc. and Johnson & Johnson
 20 (together, “Defendants”)(Plaintiff and Defendants will be collectively referred to as the “Parties”)
 21 hereby stipulate, by and through their respective counsel, as follows:

22 Whereas, the Court’s December 11, 2012 Order and Docket Entry collectively set the
 23 following procedural deadlines:

- 24 February 14, 2013 – last day for Defendants to file their dispositive motion; and
- 25 March 21, 2013 – last day for dispositive motions to be heard.

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1 Whereas, at the December 21, 2012 status update conference, the Parties notified the
2 Court that the Parties were amenable to further settlement negotiations following Plaintiff's
3 completion of certain deposition discovery;

4 Whereas, Plaintiff has now completed her remaining deposition discovery and the Parties
5 have recently resumed their settlement negotiations;

6 Whereas, at the December 21, 2012 status update conference, Defendants notified the
7 Court that Defendants intended to move for summary judgment or, in the alternative, summary
8 adjudications of all or some of Plaintiff's claims;

9 Whereas, at the December 21, 2012 status update conference, Court notified the Parties
10 that the Court would consider a request from the Parties to extend the deadline for filing
11 dispositive motions, if the parties were engaged in good faith settlement discussions;

12 Whereas the Parties are currently engaged in good faith settlement discussions and wish to
13 avoid incurring the time and expense of moving for, or opposing, dispositive motions pending
14 ongoing settlement discussions;

15 Therefore, the Parties stipulate to, and request the Court, extend the deadline to file
16 dispositive motions—by four weeks—from February 14, 2013 to **March 14, 2013**;

17 Therefore, the Parties stipulate to, and request the Court, continue the hearing on
18 dispositive motions from March 21, 2013 to **April 18, 2013 at 1:30 p.m.**;

19 Therefore, the Parties stipulate to, and request the Court, continue the next status
20 conference from March 21, 2013 to **April 18, 2013 at 1:30 p.m.**; and

21 Therefore, the Parties stipulate to, and request the Court, continue the deadline to file a
22 joint updated status report from March 14, 2013 to **April 11, 2013**.

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Dated: January 29, 2013

MORGAN, LEWIS & BOCKIUS LLP

/s/ L. Julius M. Turman
L. JULIUS M. TURMAN
PHILIP J. SMITH
Attorneys for Defendant
THERAKOS, INC. and JOHNSON &
JOHNSON

Dated: January 29, 2013

LAW OFFICES OF MICHAEL T. WELCH

By /s/ Michael T. Welch
Michael T. Welch
Attorneys for Plaintiff
CHARO OROSA

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 2/1, 2013

By [Signature]
Honora
United
Judge Edward M. Chen

FILER'S ATTESTATION

I, Philip J. Smith, am the ECF user whose identification and password are being used to file Defendants Therakos, Inc. and Johnson & Johnson's, as well as Plaintiff Charo Orosa's, Stipulation and [Proposed] Order Modifying Case Management Conference and Pretrial Order for Jury Trial, as to Dispositive Motion and Status Conference Deadlines. In compliance with General Order 45.X.B, I hereby attest that Michael T. Welch concurs in this filing.

/s/ Philip J. Smith
Philip J. Smith
Attorneys for Defendants
THERAKOS, INC. and JOHNSON &
JOHNSON

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