

1 JEFFREY I. WEINBERGER (SBN 056214)
jeffrey.weinberger@mto.com
2 TED G. DANE (SBN 143195)
ted.dane@mto.com
3 HEATHER E. TAKAHASHI (SBN 245845)
heather.takahashi@mto.com
4 ERIN J. COX (SBN 267954)
erin.cox@mto.com
5 MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue, 35th Floor
6 Los Angeles, CA 90071-1560
Telephone: (213) 683-9100
7 Facsimile: (213) 687-3702

8 Attorneys for Plaintiffs

9 TAKEDA PHARMACEUTICAL CO., LTD.,
TAKEDA PHARMACEUTICALS U.S.A., INC.,
10 TAKEDA PHARMACEUTICALS LLC, AND
TAKEDA PHARMACEUTICALS AMERICA,
11 INC.

12 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

13
14 TAKEDA PHARMACEUTICAL CO., LTD.,
TAKEDA PHARMACEUTICALS U.S.A., INC.,
15 TAKEDA PHARMACEUTICALS LLC, AND
TAKEDA PHARMACEUTICALS AMERICA,
16 INC.,
17 Plaintiffs,
18 v.
19 SANDOZ INC.,
20 Defendant.

Case No. 3:12-cv-00446 JCS
**STIPULATION TO CONTINUANCE OF
INITIAL CASE MANAGEMENT
CONFERENCE; [~~PROPOSED~~] ORDER
THEREON**

21
22
23
24
25
26
27
28

1 Plaintiffs Takeda Pharmaceutical Company Limited, Takeda Pharmaceuticals U.S.A., Inc.,
2 Takeda Pharmaceuticals LLC, and Takeda Pharmaceuticals America, Inc. (collectively, "Takeda"),
3 and Defendant Sandoz Inc. ("Sandoz") hereby stipulate through their respective attorneys as
4 follows:

5 WHEREAS, on February 27, 2012, the Court issued an Order Setting Case Management
6 Conference in the above-captioned action, scheduling the Initial Case Management Conference for
7 May 4, 2012 at 1:30 p.m.;

8 WHEREAS, Sandoz has informed Takeda that it is seeking new trial counsel;

9 WHEREAS, the parties jointly request a continuance of the Case Management Conference
10 to allow Sandoz sufficient time to obtain new trial counsel;

11 WHEREAS, the parties agree that Friday, June 1, 2012, at 1:30 p.m. is a mutually agreeable
12 date for a rescheduled Initial Case Management Conference; and

13 WHEREAS, the parties further agree that they could meet the deadlines for events leading
14 up to the Initial Case Management Conference in a more orderly fashion if that Conference were
15 postponed until June 1, 2012.

16 NOW THEREFORE, IT IS HEREBY STIPULATED that, subject to the Court's approval,
17 the Initial Case Management Conference shall be held on Friday, June 1, 2012, at 1:30 p.m. and the
18 other dates in the Corrected Order Setting Initial Case Management Conference and ADR
19 Deadlines are continued accordingly.

20 Respectfully Submitted,

21 DATED: April 25, 2012

MUNGER, TOLLES & OLSON LLP

22
23 By: /s/ Heather E. Takahashi
24 HEATHER E. TAKAHASHI

25 Attorneys for Plaintiffs
26 TAKEDA PHARMACEUTICAL CO., LTD.,
27 TAKEDA PHARMACEUTICALS U.S.A.,
28 INC., TAKEDA PHARMACEUTICALS LLC,
AND TAKEDA PHARMACEUTICALS
AMERICA, INC.

1 DATED: April 25, 2012

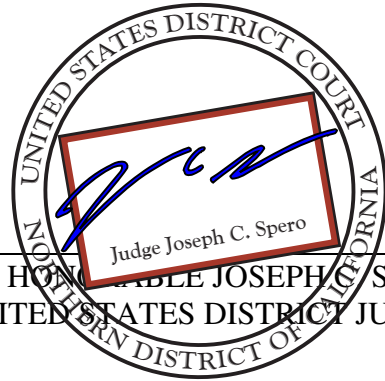
DUANE MORRIS LLP

2
3 By: /s/ Jessica E. La Londe
4 JESSICA E. LA LONDE

5 Attorneys for Defendant
6 SANDOZ INC.

7
8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

9 DATED: April 26, 2012



THE HONORABLE JOSEPH C. SPERO
UNITED STATES DISTRICT JUDGE

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

Filer's Attestation

I, Heather Takahashi, am the ECF user whose identification and password are being used to file this **STIPULATION TO CONTINUANCE OF INITIAL CASE MANAGEMENT CONFERENCE**. In compliance with General Order 45.X.B, I hereby attest that the other above-named signatory concurs in this filing.

DATED: April 25, 2012

/s/ Heather E. Takahashi

13851188.1