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6 Counsel for Defendants
 7 PFIZER INC., PFIZER IRELAND
 8 PHARMACEUTICALS, and
 9 WARNER-LAMBERT COMPANY LLC

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

13 SANDRA HELLGREN, an individual, and
 14 BERNARD A. ORSI, an individual,

14 Plaintiffs,

15 v.

16 PFIZER, INC., a Delaware Corporation, PFIZER
 17 IRELAND PHARMACEUTICALS, an Irish
 18 partnership, WARNER-LAMBERT COMPANY,
 19 formerly a Delaware Corporation, WARNER-
 20 LAMBERT COMPANY LLC, a Delaware
 21 limited liability company, RANBAXY, INC., a
 22 Delaware Corporation, and DOES 1-10,

21 Defendants.

Civil Action No.: 3:12-cv-0735 –JSW

FURTHER STIPULATION AND
 [PROPOSED] ORDER

United States District Judge
 Jeffrey S. White

WHITE & CASE LLP
 ATTORNEYS AT LAW
 SILICON VALLEY

1 WHEREAS the Notice of Removal of Action from State Court in the above-captioned
2 action was filed on February 15, 2012; and

3 WHEREAS Plaintiffs Sandra Hellgren and Bernard A. Orsi (collectively, "Plaintiffs")
4 filed a Second Amended Complaint against Defendants Pfizer Inc., Pfizer Ireland
5 Pharmaceuticals, and Warner-Lambert Company LLC (collectively, "Pfizer") on January 23,
6 2012, attached hereto as Exhibit 1, and the new caption should read "ANITA J. COX, an
7 individual; and SANDRA HELLGREN, an individual, Plaintiffs, v. PFIZER, INC, a Delaware
8 corporation; PFIZER IRELAND PHARMACEUTICALS, an Irish Partnership; WARNER-
9 LAMBERT COMPANY, formerly a Delaware corporation; WARNER-LAMBERT COMPANY
10 LLC, a Delaware Limited Liability Company; RANBAXY, INC., a Delaware corporation; and
11 DOES 1-10, Defendants; and

12 WHEREAS at least nine other actions have been filed in federal and state courts to date
13 challenging Pfizer's allegedly anticompetitive conduct with regard to Lipitor and its generic
14 competitors. A petition is currently pending before the Judicial Panel on Multidistrict Litigation
15 ("JPML") to transfer and coordinate these related federal actions, including the above-captioned
16 action, pursuant to 28 U.S.C. § 1407. *In re: Lipitor Antitrust Litigation*, MDL No. 2332. A
17 hearing to consider the transfer and coordination of the actions in MDL No. 2332 is set for March
18 29, 2012; and

19 WHEREAS Plaintiffs and Pfizer agree that the papers submitted in connection with the
20 Notice of Removal will not be deemed defective in anyway due to the filing of the Second
21 Amended Complaint, and

22 WHEREAS this Court has already granted Plaintiffs and Pfizer's Stipulation filed on
23 February 24, 2012 ("Docket No 7") on this date and this Further Stipulation is being presented to
24 clarify the operative complaint and does not, in anyway, alter or affect Docket No. 7.

25 WHEREAS Plaintiffs and Pfizer have met and conferred on this issue in good faith;

26 IT IS HEREBY STIPULATED AND AGREED, by Plaintiffs and Pfizer, through their
27 respective counsel, that the deadline for Pfizer to answer or otherwise respond to Plaintiffs'
28

1 Second Amended Complaint shall be extended to fourteen (14) days after the date the JPML
2 issues a ruling or decision regarding transfer and consolidation of actions in MDL No. 2332. The
3 parties reserve their right to discovery in accordance with the Federal Rules of Civil Procedure
4 and/or Civil Local Rules.

5
6 Respectfully submitted,

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8 Dated: March 2, 2012

/s/ Bijal V. Vakil
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Counsel for Defendants
PFIZER INC., PFIZER IRELAND
PHARMACEUTICALS, and
WARNER-LAMBERT COMPANY LLC

15
16 Dated: March 2, 2012

/s/ Lawrence G. Papale
Lawrence G. Papale, Esq.
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Counsel for Plaintiffs
SANDRA HELLGREN and BERNARD A. ORSI

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ATTESTATION CLAUSE

I, Bijal V. Vakil, hereby attest in accordance with General Order No. 45.X that Lawrence G. Papale, Counsel for Plaintiffs has provided his concurrence with the electronic filing of the foregoing document entitled **FURTHER STIPULATION AND [PROPOSED] ORDER.**

Dated: March 2, 2012

WHITE & CASE LLP

By: /s/ Bijal V. Vakil
Bijal V. Vakil

Counsel for Defendants
PFIZER INC., PFIZER IRELAND
PHARMACEUTICALS, and
WARNER-LAMBERT COMPANY LLC

ORDER

Pursuant to the above Stipulation filed in this action, it is hereby ORDERED that the time within which Defendants Pfizer Inc., Pfizer Ireland Pharmaceuticals, and Warner-Lambert Company LLC may answer or otherwise respond to Plaintiffs' Second Amended Complaint is hereby extended to fourteen (14) days after the date the Judicial Panel on Multidistrict Litigation ("JPML") issues a ruling or decision regarding the transfer and coordination of actions in *In re: Lipitor Antitrust Litigation*, MDL No. 2332.

Dated: March 5, 2012



JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE

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ATTORNEYS AT LAW
SILICON VALLEY