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9 *Counsel for Defendant Pfizer Inc., Warner-Lambert Company,*
 10 *Warner-Lambert Company, LLC, Pfizer Ireland Pharmaceuticals,*
 11 *Warner-Lambert Export, Ltd.*

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION**

14 RP HEALTHCARE, INC.; CHIMES
 15 PHARMACY, INC.; JAMES CLAYWORTH,
 16 R.Ph., an individual, d/b/a CLAYWORTH
 17 PHARMACY; MARIN APOTHECARIES,
 18 INC., d/b/a ROSS VALLEY PHARMACY;
 19 GOLDEN GATE PHARMACY SERVICES,
 20 INC., d/b/a GOLDEN GATE PHARMACY;
 21 PEDIATRIC CARE PHARMACY, INC.;
 22 MEYERS PHARMACY, INC.; TONY
 23 MAVRANTONIS, R.Ph., an individual d/b/a
 24 JACK'S DRUG; and TILLEY
 25 APOTHECARIES, INC., d/b/a ZWEBER'S
 26 APOTHECARY,

27 Plaintiffs,

28 v.

29 PFIZER, INC., PFIZER IRELAND
 30 PHARMACEUTICALS, WARNER-LAMBERT
 31 COMPANY, WARNER-LAMBERT
 32 COMPANY, LLC, WARNER-LAMBERT
 33 EXPORT, LTD., RANBAXY LABORATORIES
 34 LIMITED, RANBAXY PHARMACEUTICALS,
 35 INC., RANBAXY, INC., DAIICHI SANKYO,
 36 LTD, DAIICHI SANKYO, INC., CVS
 37 CAREMARK CORPORATION, HEALTH
 38 NET, INC., and CALIFORNIA PHYSICIANS
 39 SERVICE, INC. d/b/a Blue Shield of California,

40 Defendants.

Civil Action No.: 3:12-cv-01059 (JSW)

**STIPULATION TO EXTEND TIME
 TO ANSWER AND
 [~~PROPOSED~~ ORDER]**

Hon. Jeffrey S. White

WHITE & CASE L
 ATTORNEYS AT LAW
 SILICON VALLEY

1 WHEREAS Plaintiffs filed an Action in the Superior Court of Sonoma County on January
2 31, 2012, naming Pfizer, Inc., Pfizer Ireland Pharmaceuticals, Warner-Lambert Company,
3 Warner-Lambert Company, LLC, and Warner-Lambert Export, Ltd (collectively, "Pfizer") as
4 Defendants; and

5 WHEREAS, Plaintiffs served a copy of the Complaint on Defendants Pfizer Inc., Warner-
6 Lambert Company, and Warner-Lambert Company, LLC on February 2, 2012; and

7 WHEREAS Plaintiffs' counsel and Pfizer's counsel have met and conferred on this issue
8 in good faith and Pfizer's counsel agreed to voluntarily accept service for Pfizer Ireland
9 Pharmaceuticals, Warner-Lambert Export, Ltd. to avoid the costs and expense related to foreign
10 service; and

11
12 WHEREAS the Notice of Removal of Action from State Court in the above-captioned
13 action was filed on March 2, 2012; and

14 WHEREAS, Plaintiffs filed the Motion for Remand on March 15, 2012, which is set for
15 hearing on April 27, 2012,

16 IT IS HEREBY STIPULATED AND AGREED, by Plaintiffs and Pfizer, through their
17 respective counsel, that the deadline for Pfizer to answer or otherwise respond to Plaintiffs'
18 Complaint shall be extended to thirty days following the Court's order on Plaintiffs' Motion for
19 Remand, whether the case is remanded to State Court or remains in Federal Court.
20

21
22 Dated: March 23, 2012

Respectfully Submitted,

23
24 WHITE & CASE LLP

25 /s/ Bijal V. Vakil

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28 WHITE & CASE LLP
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STIPULATION TO EXTEND TIME TO ANSWER
AND ~~PROPOSED~~ ORDER
CASE NO. 3:12-cv-01059 (JSW)

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Counsel for Defendant Pfizer Inc., Warner-Lambert Company, Warner-Lambert Company, LLC, Pfizer Ireland Pharmaceuticals, Warner-Lambert Export, Ltd.

Dated: March 23, 2012

ALIOTO LAW FIRM

/s/ Jamie L. Miller

Joseph M. Alioto, SBN 42680
Theresa D. Moore, SBN 99978
Jamie L. Miller, SBN 271452
ALIOTO LAW FIRM
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Counsel for Plaintiffs

ATTESTATION CLAUSE

I, Bijal V. Vakil, hereby attest in accordance with General Order No. 45.X that each of the signatories above have provided their concurrence with the electronic filing of the foregoing document entitled STIPULATION TO EXTEND TIME TO ANSWER AND [PROPOSED] ORDER.

Dated: March 23, 2012

WHITE & CASE LLP

/s/ Bijal V. Vakil

BIJAL V. VAKIL

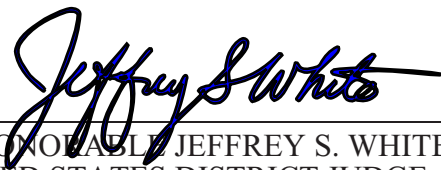
Counsel for Defendant Pfizer Inc., Warner-Lambert Company, Warner-Lambert Company, LLC, Pfizer Ireland Pharmaceuticals, Warner-Lambert Export, Ltd.

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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, Warner-Lambert Company and Warner-Lambert Export, Ltd may answer or otherwise respond to Plaintiffs' Complaint is hereby extended to thirty days following the Court's order on Plaintiffs' Motion for Remand.

Dated: March 26, 2012



THE HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE