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11	[Additional Counsel Listed at Signature Page]	
12	UNITED STATES DISTRICT COURT	
13	NORTHERN DISTRICT OF CALIFORNIA	
14	SAN FRANCISCO DIVISION	
15		
16	JAMES CAOUETTE et al.)	No. 12-1814 EMC
17	Plaintiffs,)	
18	v.)	STIPULATION AND [PROPOSED] ORDER REGARDING OMNIBUS
19	BRISTOL-MYERS SQUIBB) COMPANY, MCKESSON)	MOTIONS AND AMENDED BRIEFING SCHEDULE
20	CORPORATION, and) DOES 1 to 100,)	
21	Defendants.	
22		
23	STIP. AND [PROPOSED] ORDER RE	Nos. 12-1814 EMC, 12-1815 EMC, 12-1816 EMC,
24	OMNIBUS MOTIONS AND AM. BR. SCHED.	12-1818 EMC, 12-1819 EMC, 12-1820 EMC, 12-1821 EMC, 12-1822 EMC

1	VIRGIL S. ANDERSON et al.) No. 12-1815 EMC
2	Plaintiffs,)
3	v.)
4	BRISTOL-MYERS SQUIBB COMPANY, MCKESSON))
5	CORPORATION, and DOES 1 to 100,))
6	Defendants.))
7		_)
8	PHILIP BRYAN et al.) No. 12-1816 EMC
9	Plaintiffs,))
10	V.)
11 12	BRISTOL-MYERS SQUIBB COMPANY, MCKESSON))
13	CORPORATION, and DOES 1 to 100,))
14	Defendants.))
15		
16	DAVID D. APPLEN et al.) No. 12-1818 EMC
17	Plaintiffs,)
18	V.))
19	BRISTOL-MYERS SQUIBB COMPANY, MCKESSON))
20	CORPORATION, and DOES 1 to 100,	,))
21	Defendants.))
22		
23	STIP. AND [PROPOSED] ORDER RE OMNIBUS MOTIONS AND AM. BR. SCHED.	Nos. 12-1814 EMC, 12-1815 EMC, 12-1816 EMC, 12-1818 EMC, 12-1819 EMC, 12-1820 EMC, 12-1821
24		EMC, 12-1822 EMC - 2 -
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1	FRANCIS W. ADAMS et al.) No. 12-1819 EMC
2	Plaintiffs,))
3	v.))
4	BRISTOL-MYERS SQUIBB COMPANY, MCKESSON))
5	CORPORATION, and DOES 1 to 100,))
6	Defendants.))
7		
8		
9	RICKY L. ALEXANDER et al.) No. 12-1820 EMC)
10	Plaintiffs,)
11	V.))
12	BRISTOL-MYERS SQUIBB COMPANY, MCKESSON	
13	CORPORATION, and DOES 1 to 100,)
14	Defendants.))
15)
16	VIOLA J. BALES et al.) No. 12-1821 EMC
17	Plaintiffs,))
18	V.))
19	BRISTOL-MYERS SQUIBB COMPANY, MCKESSON))
20	CORPORATION, and DOES 1 to 100,))
21	Defendants.))
22)
23	STIP. AND [PROPOSED] ORDER RE OMNIBUS MOTIONS AND AM. BR. SCHED.	Nos. 12-1814 EMC, 12-1815 EMC, 12-1816 EMC, 12-1818 EMC, 12-1819 EMC, 12-1820 EMC, 12-1821 EMC, 12-1822 EMC
24 25		EMC, 12-1822 EMC - 3 -
43		

1	GWENDOLAN E. AILES et al.) No. 12-1822 EMC	
2	Plaintiffs,)	
3	v.)	
4	BRISTOL-MYERS SQUIBB) COMPANY, MCKESSON)	
5	CORPORATION, and) DOES 1 to 100,)	
6	Defendants.	
7)	
8	This Joint Stipulation is made by and between Plaintiffs in Adams et al. v. Bristol-	
9	Myers Squibb Company et al., No. 12-1819 EMC; Ailes et al. v. Bristol-Myers Squibb	
10	Company et al., No. 12-1822 EMC; Alexander et al. v. Bristol-Myers Squibb Company et	
11	al., No. 12-1820 EMC; Anderson et al. v. Bristol-Myers Squibb Company et al., No. 12-	
12	1815 EMC; Applen et al. v. Bristol-Myers Squibb Company et al., No. 12-1818 EMC; Bales	
13	et al. v. Bristol-Myers Squibb Company et al., No. 12-1821 EMC; Bryan et al. v. Bristol-	
14	Myers Squibb Company et al., No. 12-1816 EMC; and Caouette et al. v. Bristol-Myers	
15	Squibb Company et al., No. 12-1814 EMC ("Plaintiffs") and Defendant Bristol-Myers	
16	Squibb Company ("Defendant"), in the interest of efficiency and so as to avoid	
17	overburdening the Court with excessive papers:	
18	IT IS HEREBY STIPULATED AND AGREED that pursuant to the page limitations	

IT IS HEREBY STIPULATED AND AGREED that pursuant to the page limitations in LR 7-3(a), Defendant will file and serve on Plaintiffs via ECF a single Omnibus Opposition to Plaintiffs' respective Motions to Remand to State Court in the above-captioned cases on or before May 21, 2012. Defendants shall file the Omnibus Opposition

STIP. AND [PROPOSED] ORDER RE OMNIBUS MOTIONS AND AM. BR. SCHED.

Nos. 12-1814 EMC, 12-1815 EMC, 12-1816 EMC, 12-1818 EMC, 12-1819 EMC, 12-1820 EMC, 12-1821 EMC, 12-1822 EMC

1	in Caouette et al. v. Bristol-Myers Squibb Company et al., No. 12-1814 EMC, and shall file	
2	a notice referencing the Omnibus Opposition in each action.	
3	IT IS FURTHER STIPULATED AND AGREED that pursuant to the page	
4	limitations in LR 7-3(c), Plaintiffs will file and serve on Defendant via ECF a single	
5	Omnibus Reply in Support of Plaintiffs' Motions to Remand to State Court in the above-	
6	captioned cases on or before by June 1, 2012. Plaintiffs shall file the Omnibus Reply in	
7	Caouette et al. v. Bristol-Myers Squibb Company et al., No. 12-1814 EMC, and shall file a	
8	notice referencing the Omnibus Reply in each action.	
9	IT IS FURTHER STIPULATED AND AGREED that the hearing date for all of the	
10	cases shall be June 22, 2012, at 1:30 pm, as previously noticed by Plaintiffs.	
11	IT IS FURTHER REQUESTED that the Court enter Orders on the Motions to	
12	Remand to State Court in each action.	
13	IT IS SO STIPULATED.	
14 15	Dated: May 9, 2012 AUDET & PARTNERS LLP 221 Maine Street, Suite 1460 San Francisco, CA 94105	
16 17 18	By: /s/ WILLIAM M. AUDET Attorneys for Plaintiffs in <i>Bryan et al. v. Bristol-Myers Squibb Company et al.</i> , No. 12-1816 EMC	
20	Dated: May 9, 2012 NAPOLI BERN RIPKA SHKOLNIK & ASSOCIATES LLP 2361 Rosencrans Avenue, Suite 450 El Segundo, CA 90245	
22	By: /s/ HUNTER J. SHKOLNIK	
23 24	STIP. AND [PROPOSED] ORDER RE Nos. 12-1814 EMC, 12-1815 EMC, 12-1816 EMC, OMNIBUS MOTIONS AND AM. BR. SCHED. 12-1818 EMC, 12-1819 EMC, 12-1820 EMC, 12-1821 EMC, 12-1822 EMC	

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Attorneys for Plaintiffs in Adams et al. v. Bristol-Myers Squibb Company et al., No. 12-1819 EMC; Ailes et al. v. Bristol-Myers Squibb Company et al., No. 12-1822 EMC; Alexander et al. v. Bristol-Myers Squibb Company et al., No. 12-1820 EMC; Anderson et al. v. Bristol-Myers Squibb Company et al., No. 12-1815 EMC; Applen et al. v. Bristol-Myers Squibb Company et al., No. 12-1818 EMC; Bales et al. v. Bristol-Myers Squibb Company et al., No. 12-1821 EMC; Bryan et al. v. Bristol-Myers Squibb Company et al., No. 12-1816 EMC; and Caouette et al. v. Bristol-Myers Squibb Company et al., No. 12-1814 EMC

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San Francisco, CA 94111

By: <u>/s/</u> JEREMY M. MCLAUGHLIN

Attorneys for Defendant Bristol-Myers Squibb Company

PURSUANT TO STIPULATION, IT IS SO ORDER

Dated: May 9, 2012



23 STIP. AND [PROPOSED] ORDER RE OMNIBUS MOTIONS AND AM. BR. SCHED.

Nos. 12-1814 EMC, 12-1815 EMC, 12-1816 EMC, 12-1818 EMC, 12-1819 EMC, 12-1820 EMC, 12-1821 EMC, 12-1822 EMC

1	I, Jeremy M. McLaughlin, am the ECF User whose ID and password are being used to fil		
2	this Stipulation and [Proposed] Order Regard	this Stipulation and [Proposed] Order Regarding Omnibus Motions and Amended Briefing	
3	Schedule. In compliance with General Order	Schedule. In compliance with General Order 45, X.B, I hereby attest that William M. Audet and	
4	Hunter J. Shkolnik have concurred in this filing.		
5			
6		ARNOLD & PORTER LLP Three Embarcadero Center, 7th Floor San Francisco, CA 94111	
7			
8		By: /s/ JEREMY M. MCLAUGHLIN	
9	11	Attorneys for Defendant Bristol-Myers Squibb Company	
10		Elistor Hyers Equico Company	
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23	STIP. AND [PROPOSED] ORDER RE	Nos. 12-1814 EMC, 12-1815 EMC, 12-1816 EMC,	

OMNIBUS MOTIONS AND AM. BR. SCHED.

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Nos. 12-1814 EMC, 12-1815 EMC, 12-1816 EMC, 12-1818 EMC, 12-1819 EMC, 12-1820 EMC, 12-1821 EMC, 12-1822 EMC