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10 Attorneys for Defendant
 Bristol-Myers Squibb Company

11 [Additional Counsel Listed at Signature Page]

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN FRANCISCO DIVISION

15 JAMES CAOQUETTE *et al.*) No. 12-1814 EMC

16)
 17 Plaintiffs,)

18 v.)

19 BRISTOL-MYERS SQUIBB)
 COMPANY, MCKESSON)
 CORPORATION, and)
 20 DOES 1 to 100,)

21 Defendants.)
 22)

**STIPULATION AND [PROPOSED]
 ORDER REGARDING OMNIBUS
 MOTIONS AND AMENDED
 BRIEFING SCHEDULE**

23 STIP. AND [PROPOSED] ORDER RE
 24 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 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 BRISTOL-MYERS SQUIBB)
COMPANY, MCKESSON)
12 CORPORATION, and)
DOES 1 to 100,)
13 Defendants.)
14)

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 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 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 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 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
 19 in LR 7-3(a), Defendant will file and serve on Plaintiffs via ECF a single Omnibus
 20 Opposition to Plaintiffs’ respective Motions to Remand to State Court in the above-
 21 captioned cases on or before May 21, 2012. Defendants shall file the Omnibus Opposition
 22

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

Dated: May 9, 2012

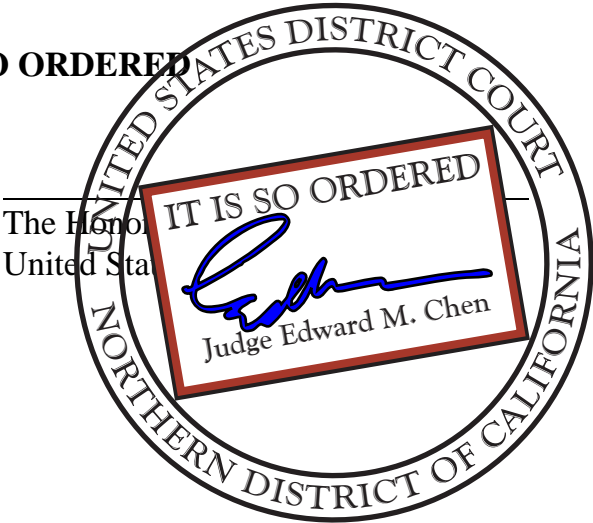
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By: /s/ _____
JEREMY M. MCLAUGHLIN

Attorneys for Defendant
Bristol-Myers Squibb Company

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: May 9, 2012



1 I, Jeremy M. McLaughlin, am the ECF User whose ID and password are being used to file
2 this Stipulation and [Proposed] Order Regarding Omnibus Motions and Amended Briefing
3 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 Dated: May 9, 2012

ARNOLD & PORTER LLP
Three Embarcadero Center, 7th Floor
San Francisco, CA 94111

7
8 By: /s/
JEREMY M. MCLAUGHLIN

9 Attorneys for Defendant
10 Bristol-Myers Squibb Company