

1 William M. Audet (SBN: 117456)  
 Mark E. Burton, Jr. (SBN: 178400)  
 2 Jill T. Lin (SBN: 284962)  
 AUDET & PARTNERS, LLP  
 3 221 Main Street, Suite 1460  
 San Francisco, California 94105  
 4 Telephone: 415.568.2555  
 Facsimile: 415.568.2556

5 *Attorneys for Plaintiff Nicole Baker*

6 Alicia J. Donahue (SBN 117412)  
 7 Amir Nassihi(SBN 235936)  
 SHOOK, HARDY & BACON L.L.P.  
 8 One Montgomery, Suite 2700  
 San Francisco, California 94104  
 9 Telephone: 415.544.1900  
 Facsimile: 415.391.0281

10 *Attorneys for Defendant*  
 11 *BAYER HEALTHCARE*  
 12 *PHARMACEUTICALS INC.*

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

16 NICOLE BAKER,  
 17 Plaintiff,  
 18 v.  
 19 BAYER HEALTHCARE  
 20 PHARMACEUTICALS, INC.,  
 21 Defendant.

Case No. 3:13-cv-00490-TEH  
**STIPULATION AND ~~[PROPOSED]~~**  
**ORDER TO CONTINUE CASE**  
**MANAGEMENT CONFERENCE**

Honorable Thelton E. Henderson

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 24 Pursuant to Paragraph 4 of the Civil Standing Orders of the Honorable Thelton E. Henderson  
 25 and Rule 7-12 of the Civil Local Rules for the United States District Court for the Northern District  
 26 of California, Plaintiff Nicole Baker (“Plaintiff”) and Defendant Bayer HealthCare Pharmaceuticals  
 27 Inc. (“Defendant”) (collectively referred to as the “Parties”) through their respective counsel hereby  
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1 submit this stipulated request to continue the October 6, 2014 case management conference in this  
2 matter to October 27, 2014, or any other later date convenient for the Court's calendar.

3 This stipulated request is based upon the fact that defense counsel had a longstanding pre-  
4 booked East Coast trip for a client meeting and will not be able to attend the October 6, 2014 case  
5 management conference. The Parties recently filed stipulation and proposed order to continue the  
6 case management conference to October 14, 2014, to allow time for parties to work on resolving  
7 their ongoing discovery disputes. (Dkt. 54) However, the Court scheduled the conference to  
8 October 6, 2014, a date in conflict with defense counsel's prior pre-booked travel arrangements to  
9 the East Coast.

10 The Parties are in the process of finalizing a Joint Discovery Letter outlining each side's  
11 position pertaining to Plaintiff's complaints regarding Defendant's production of documents as it  
12 relates to adverse event reports and sales call notes.

13 Accordingly, the Parties respectfully request that this Court continue the October 6, 2014  
14 Case Management Conference to October 27, November 3, November 10, 2014, or to a later date  
15 more convenient to the Court's calendar.

16 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties through  
17 their respective attorneys of record that:

- 18 1. The October 6, 2014 case management conference is continued to October 27, 2014,  
19 November 3, November 10, or to a later date convenient to the Court's calendar; and
- 20 2. The relevant deadlines under Rule 26 of the Federal Rules of Civil Procedure and Civil  
21 Local Rule 16-9 are continued to track the new date for the case management conference.

22  
23 Dated: August 29, 2014

By: /s/ Jill T. Lin  
Jill T. Lin

24 Attorneys for Plaintiff  
25 Nicole Baker

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Dated: August 29, 2014

By: /s/ Alicia J. Donahue  
Alicia J. Donahue

Attorneys for Defendant  
Bayer HealthCare Pharmaceuticals Inc.

Pursuant to L.R. 5-11(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatories.

By: /s/ Alicia J. Donahue  
Alicia J. Donahue

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~~[PROPOSED]~~ ORDER

The Court hereby orders that the case management conference currently set for October 6, 2014 is continued to October 27, 2014, ~~November 3, November 10, or to a later date convenient to the Court's calendar.~~ The relevant deadlines under Rule 26 of the Federal Rules of Civil Procedure and Civil Local Rule 16-9 are continued to track the new date for the case management conference.

IT IS SO ORDERED.

Dated: 09/02/2014



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THE HONORABLE THELTON E. HENDERSON  
U.S. DISTRICT COURT JUDGE