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21 Bayer Healthcare Pharmaceuticals, Inc.

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
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5 MIRIAM CRUZ,

6 Plaintiff,

7 v.

8 BAYER HEALTHCARE
9 PHARMACEUTICALS, INC.,

10 Defendant.

Case No. 3:13-cv-00543-MMC

**STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING BRIEFING SCHEDULE ON
BAYER HEALTHCARE
PHARMACEUTICALS, INC.'S MOTION TO
DISMISS AND MOTION TO STRIKE**

Date: April 19, 2013

Time: 9:00 a.m.

Ctrm: 7

Complaint filed: February 7, 2013

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14 IT IS HEREBY STIPULATED by and between, Plaintiff Miriam Cruz (“Plaintiff”), and
15 Defendant Bayer Healthcare Pharmaceuticals, Inc. (“Bayer”), by and through their attorneys of
16 record, that Plaintiff will take her pending Motion to Stay and all applicable briefing schedules
17 related to that off calendar and that the briefing schedule on Bayer’s Motion to Dismiss and Motion
18 to Strike be extended as follows:

- 19 1. Good cause exists for extending the briefing schedule on Bayer’s Motion to Dismiss and
20 Motion to Strike. This case is potentially related to Multidistrict Litigation (“MDL”)
21 Docket No. 2434, *In re: Mirena IUD Products Liability Litigation*. The JPML is
22 scheduled to hear a motion to transfer these cases on March 21, 2013.
- 23 2. Plaintiff’s deadline to file an opposition to Bayer’s Motion to Dismiss and Motion to
24 Strike is currently March 19, 2013. Bayer’s deadline to file a reply is currently March
25 26, 2013.
- 26 3. The parties respectfully request that the Court extend Plaintiff’s deadline to file an
27 opposition to Bayer’s Motion to Strike and Motion to Dismiss to April 5, 2013.

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4. The parties respectfully request that the Court extend Bayer's deadline to file a reply to its Motion to Strike and Motion to Dismiss to April 12, 2013.

Dated: March 18, 2013

By: /s/ Michael K. Johnson
MICHAEL K. JOHNSON

MARK P. ROBINSON, JR.
DANIEL S. ROBINSON
KAREN L. KARAVATOS
SHANNON LUKEI

Attorneys for Plaintiff MIRIAM CRUZ

Dated: March 18, 2013

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

Attorneys for Defendant BAYER
HEALTHCARE
PHARMACEUTICALS, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

IT IS FURTHER ORDERED that the hearing on defendant's motion is continued to April 26, 2013.

IT IS FURTHER ORDERED that plaintiff's Motion to Stay is deemed withdrawn without prejudice.

DATED: March 19, 2013


HONORABLE MAXINE M. CHESNEY