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6 *Liaison Counsel for Lead Plaintiff the Boilermaker-Blacksmith
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10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 DENIS MULLIGAN, Individually and on
 13 Behalf of All Others Similarly Situated,

14 Plaintiff,

15 v.

16 IMPAX LABORATORIES, INC., LARRY
 17 HSU, and ARTHUR A. KOCH,

18 Defendants.

Case No. 3:13-cv-01037-EMC

**STIPULATION AND [PROPOSED]
 ORDER REGARDING SCHEDULING**

19 HAVERHILL RETIREMENT SYSTEM,
 20 Individually and on Behalf of All Others
 Similarly Situated,

21 Plaintiff,

22 v.
 23

24 IMPAX LABORATORIES, INC., LARRY
 25 HSU, and ARTHUR A. KOCH,

26 Defendants.

Case No. 3:13-CV-01566-EMC

1 Lead Plaintiff Boilermaker Blacksmith National Pension Trust, by and through its
2 respective counsel (“Lead Plaintiff”), and Defendants Impax Laboratories, Inc., Larry Hsu, and
3 Arthur A. Koch, by and through their respective counsel, (collectively, “Defendants”) hereby
4 stipulate to the following:

5 WHEREAS, a case management conference is currently set for October 16, 2014 and the
6 parties’ case management statement is due on October 9, 2014 (Dkt. #105);

7 WHEREAS, on September 22, 2014, the parties engaged in a mediation and agreed to a
8 settlement-in-principle to resolve this action;

9 WHEREAS, this Stipulation and Order is without prejudice to, or waiver of, any rights,
10 arguments, or defenses otherwise available to the parties to this action; and

11 WHEREAS, the parties believe that in order to avoid waste of judicial and the parties’
12 resources, the case management conference and case management statement should be continued
13 until further order of the Court and the action should be stayed while the Court considers whether
14 to approve the proposed settlement.

15 NOW THEREFORE, the undersigned parties, by and through their counsel of record,
16 stipulate and agree, subject to the Court’s approval, as follows:

- 17 1. The case management conference currently scheduled for October 16, 2014 is
18 continued until further order of the Court;
- 19 2. The deadline for the parties’ case management statement, currently set for
20 October 9, 2014, is continued until further order of the Court; and
- 21 3. The deadlines contained in the May 29, 2014 Order are suspended until further
22 order of the Court and the case is stayed in all respects except as to proceedings
23 concerning the approval and implementation of the proposed settlement.

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1 DATED: September 26, 2014

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3 **GOLD BENNETT CERA & SIDENER LLP LATHAM & WATKINS LLP**

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5 By: /s/ Solomon B. Cera
6 Solomon B. Cera

7 By: Peter A. Wald
8 Peter A. Wald

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10 *Boilermaker Blacksmith National Pension*
11 *Trust*

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Inc., Larry Hsu, and Arthur A. Koch,

Counsel for Lead Plaintiff the Boilermaker
Blacksmith National Pension Trust

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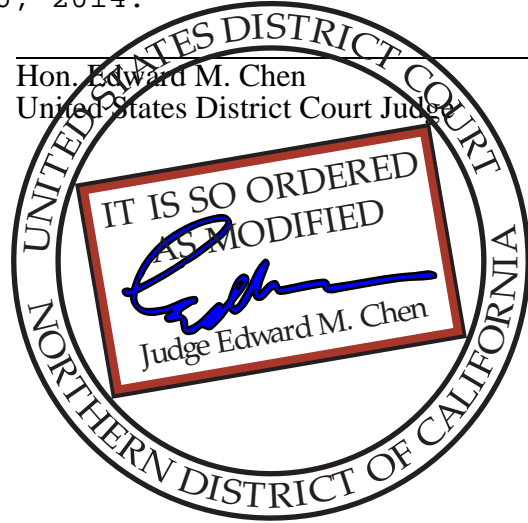
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PURSUANT TO STIPULATION, IT IS SO ORDERED. A further CMC is set for December 4, 2014 at 10:30 a.m. An updated joint CMC Statement shall be filed by November 26, 2014.

DATED: 9/29/14

Hon. Edward M. Chen
United States District Court Judge



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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Order Regarding Scheduling. Pursuant to General Order No. 45, Section X(B) regarding signatures, I, Solomon B. Cera, attest that concurrence in the filing of this document has been obtained.

DATED: September 26, 2014

_____/s/ Solomon B. Cera_____
Solomon B. Cera