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 11 *Trust and Liaison Counsel for the Class*

12 [Additional counsel listed on signature page]

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

15 DENIS MULLIGAN, Individually and on
 16 Behalf of All Others Similarly Situated,

17 Plaintiff,

18 v.

19 IMPAX LABORATORIES, INC., LARRY
 20 HSU, ARTHUR A. KOCH and BRYAN M.
 21 REASONS,

22 Defendants.

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

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

CLASS ACTION

23 HAVERHILL RETIREMENT SYSTEM,
 24 Individually and on Behalf of All Others
 25 Similarly Situated,

26 Plaintiff,

27 v.

28 IMPAX LABORATORIES, INC., LARRY
 HSU, ARTHUR A. KOCH, and BRYAN M.
 REASONS,

Defendants.

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

STIPULATION AND [PROPOSED] ORDER REGARDING PRETRIAL SCHEDULING
 Case No. 3:13-cv-01037-EMC

1 WHEREAS, by Order dated July 2, 2013, the Court consolidated the above-captioned
2 actions, appointed the Boilermaker Blacksmith National Pension Trust as Lead Plaintiff, and
3 approved Cohen Milstein Sellers & Toll PLLC as Lead Counsel, and Gold Bennett Cera &
4 Sidener LLP as liaison counsel;

5 WHEREAS, by Order dated July 15, 2013, the Court set September 3, 2013 as the
6 deadline for Lead Plaintiff to file a Consolidated Class Action Complaint (the “Consolidated
7 Complaint”); set deadlines for Defendants to answer, move to dismiss, or otherwise respond to
8 the Consolidated Complaint; and set the dates for briefing any such motion to dismiss (ECF
9 No. 56);

10 WHEREAS, the Court has not previously modified the deadlines set on July 15, 2013;

11 WHEREAS, Lead Plaintiff has worked earnestly to meet the existing deadline but
12 scheduling issues have required that a brief ten-day modification of the schedule be sought;

13 WHEREAS, Lead Plaintiff and Defendants Impax Laboratories, Inc., Larry Hsu, Arthur
14 A. Koch, and Bryan M. Reasons (“Defendants”), through their respective counsel, have conferred
15 and agreed to extend the date for Lead Plaintiff to file the Consolidated Complaint by ten days;

16 WHEREAS, Lead Plaintiff and Defendants, through their respective counsel, have further
17 agreed to extend by ten days the dates for Defendants to answer, move to dismiss, or otherwise
18 respond to the Consolidated Complaint, and the dates for briefing any such motion to dismiss;

19 WHEREAS, the proposed time modifications would have no effect on the schedule for the
20 case other than as described below;

21 Accordingly, IT IS HEREBY STIPULATED AND AGREED, by the parties, through
22 their undersigned counsel, subject to Court approval as follows:

- 23 1. Lead Plaintiff shall file its Consolidated Complaint by September 13, 2013.
- 24 2. Defendants shall file their answers or motions to dismiss the Consolidated
25 Complaint on or before November 14, 2013.
- 26 3. Lead Plaintiff shall file its opposition to any motion to dismiss on or before
27 December 30, 2013.

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4. Defendants shall file any replies in support of their motion(s) to dismiss on or before January 31, 2014.

Dated: August 27, 2013

GOLD BENNETT CERA & SIDENER LLP

/s/ Solomon B. Cera
Solomon B. Cera

Counsel for the Boilermaker Blacksmith National Pension Trust and Liaison Counsel for the Class

COHEN MILSTEIN SELLERS
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*Counsel for Defendants Impax Laboratories,
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Reasons*

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. Motion to be heard on 2/20/14
at 1:30 p.m.

Dated: August 28, 2013

Submitted by:

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