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 12 *Sanofi-Aventis U.S. LLC, Sanofi US Services Inc.,*
 13 *and Sanofi-Synthelabo Inc.*

14 [Additional Counsel Listed At Signature Page]

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

18 DOLLY SANDERS *et al.*,

19 Plaintiff,

20 v.

21 BRISTOL-MYERS SQUIBB COMPANY,
 22 SANOFI-AVENTIS U.S. LLC., SANOFI-
 23 AVENTIS U.S., INC., SANOFI-
 24 SYNTHELABO, INC., MCKESSON
 CORPORATION, and DOES 1 to 100,

25 Defendants.

No. 14-2652 ~~EDL~~ RS

**JOINT STIPULATION AND
 26 ~~[PROPOSED]~~ ORDER TO STAY
 27 LITIGATION PENDING TRANSFER TO
 28 THE PLAVIX® MDL**

Judge: ~~Hon. Elizabeth D. Laporte~~

1 This Joint Stipulation is made by and between Plaintiffs in *Sanders et al. v. Bristol-Myers*
2 *Squibb Co. et al.*, No. CV-14-2652 EDL (N.D. Cal.), and Defendants Bristol-Myers Squibb
3 Company, Sanofi-Aventis U.S. LLC, Sanofi US Services Inc., and Sanofi-Synthelabo Inc.,¹
4 (collectively “Defendants”), by and through the undersigned counsel of record, with reference to the
5 following facts:

6 1. WHEREAS, on February 12, 2013, the Judicial Panel on Multidistrict Litigation
7 (“JPML”) established a multidistrict Plavix® litigation in the District of New Jersey, assigned to
8 Judge Freda Wolfson;

9 2. WHEREAS, on June 6, 2014, Plaintiffs filed the *Sanders* action in the Superior
10 Court of California, San Francisco County;

11 3. WHEREAS, on June 9, 2014, the *Sanders* action was removed to this Court by
12 Defendants;

13 4. WHEREAS, on June 11, 2014, Defendants tagged this case for transfer to the
14 Plavix® MDL and anticipates that the JPML will finalize a conditional transfer order for this case
15 soon; and

16 5. WHEREAS, the Parties agree that the *Sanders* action should be stayed pending its
17 anticipated transfer to the Plavix® MDL in the District of New Jersey.

18
19 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s
20 approval, that the *Sanders* action should be stayed pending its anticipated transfer to the Plavix®
21 MDL in the District of New Jersey.

22
23 **IT IS SO STIPULATED.**
24
25

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27 ¹ Sanofi-Aventis U.S. LLC was incorrectly designated as “Sanofi-Aventis U.S. LLC.,” Sanofi-
28 Aventis U.S. Inc. was incorrectly designated as “Sanofi-Aventis U.S., Inc.,” and Sanofi-Synthelabo
Inc. was incorrectly designated as “Sanofi-Synthelabo, Inc.” in the Complaint. As of June 11, 2012,
Sanofi-Aventis U.S. Inc. changed its name to Sanofi US Services Inc.

1 Dated: June 20, 2014

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9 *Attorney for Plaintiffs*

11 Dated: June 20, 2014

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14 By: /s/ Sharon D. Mayo
Sharon D. Mayo

16 *Attorneys for Defendants Bristol-Myers Squibb
17 Company, Sanofi-Aventis U.S. LLC, Sanofi US
18 Services Inc., and Sanofi-Synthelabo Inc.*

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

22 Date: 6/23/14



23 ~~Judge Elizabeth D. Laporte~~ Judge Richard Seeborg
24 ~~U.S. Magistrate Judge~~ U.S. District Judge