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11 *Attorneys for Defendants Bristol-Myers Squibb Company,*
 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 JOSEPH TERRY *et al.*,

No. 14-2656 JSW

19 Plaintiff,

20 v.

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO STAY
 LITIGATION PENDING TRANSFER TO
 THE PLAVIX® MDL**

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

Judge: Hon. Jeffrey S. White

24 Defendants.
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1 This Joint Stipulation is made by and between Plaintiffs in *Terry et al. v. Bristol-Myers*
2 *Squibb Co. et al.*, No. CV-14-2655 JSW (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 *Terry* action in the Superior Court
10 of California, San Francisco County;

11 3. WHEREAS, on June 9, 2014, the *Terry* 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 *Terry* action should be stayed pending its
17 anticipated transfer to the Plavix® MDL in the District of New Jersey.

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

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23 **IT IS SO STIPULATED.**

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¹ Sanofi-Aventis U.S. LLC was incorrectly designated as “Sanofi-Aventis U.S. LLC.,” Sanofi-
27 Aventis U.S. Inc. was incorrectly designated as “Sanofi-Aventis U.S., Inc.,” and Sanofi-Synthelabo
28 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

Joshua C. Ezrin
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5 Jeffrey A. Travers
6 THE MILLER FIRM, LLC
7 108 Railroad Avenue
8 Orange, VA 22960

9 By: /s/ Joshua C. Ezrin
Joshua C. Ezrin

10 *Attorney for Plaintiffs*

11 Dated: June 20, 2014

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Three Embarcadero Center, 10th Floor
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14 By: /s/ Sharon D. Mayo
15 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: June 24, 2014



1 I, Sharon D. Mayo, am the ECF User whose ID and password are being used to file this
2 Stipulation and [Proposed] Order to Stay Litigation Pending Transfer to the Plavix® MDL. In
3 compliance with General Order 45, X.B, I hereby attest that Joshua C. Ezrin has concurred in this
4 filing.

5
6 Dated: June 20, 2014

ARNOLD & PORTER LLP

7
8 By: /s/ Sharon D. Mayo

9 Sharon D. Mayo

10 *Attorneys for Defendants Bristol-Myers Squibb*
11 *Company, Sanofi-Aventis U.S. LLC, Sanofi US*
12 *Services Inc., and Sanofi-Synthelabo Inc.*