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17 *Attorneys for Defendant Bristol-Myers Squibb Company*

18 [Additional Counsel Listed At Signature Page]

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 JENNIE CADDELL *et al.*,

23 Plaintiff,

24 v.

25 BRISTOL-MYERS SQUIBB COMPANY,
26 MCKESSON CORPORATION, and
27 DOES 1 to 100,

28 Defendants.

No. 14-3482 RS

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

Judge: Hon. Richard Seeborg

1 This Joint Stipulation is made by and between Plaintiffs in *Caddell et al. v. Bristol-Myers*
2 *Squibb Co. et al.*, No. CV-14-3482 RS (N.D. Cal.), and Defendant Bristol-Myers Squibb Company
3 (“BMS”) (collectively “the Parties”), by and through the undersigned counsel of record, with
4 reference to the following facts:

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

8 2. WHEREAS, on July 31, 2014, Plaintiffs filed the *Caddell* action in the Superior
9 Court of California, San Francisco County;

10 3. WHEREAS, on August 1, 2014, the *Caddell* action was removed to this Court by
11 Defendant BMS;

12 4. WHEREAS, on August 12, 2014, Defendant BMS tagged this case for transfer to the
13 Plavix® MDL and anticipates that the JPML will issue a conditional transfer order for this case
14 soon; and

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

17
18 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s
19 approval, that the *Caddell* action should be stayed pending its anticipated transfer to the Plavix®
20 MDL in the District of New Jersey.

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22 **IT IS SO STIPULATED.**
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Dated: August 15, 2014

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

Attorney for Plaintiffs

Dated: August 15, 2014

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San Francisco, CA 94111

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

*Attorney for Defendant
Bristol-Myers Squibb Company*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 8/18/14



Judge Richard Seeborg
U.S. District Judge