

1 Jonathan F. Cohn (*pro hac vice*)
 jcohn@sidley.com
 2 Benjamin M. Mundel (*pro hac vice*)
 bmundel@sidley.com
 3 SIDLEY AUSTIN LLP
 1501 K Street, N.W.
 4 Washington, D.C. 20005
 Telephone: (202) 736.8000
 5 Facsimile: (202) 736.8711

6 Ryan M. Sandrock (SBN 251781)
 rsandrock@sidley.com
 7 SIDLEY AUSTIN LLP
 555 California Street, Suite 2000
 8 San Francisco, CA 94104
 Telephone: (415) 772.1200
 9 Facsimile: (415) 772.7400

10 Attorneys for Defendants
 Bayer AG, Bayer Corporation, and Bayer
 11 HealthCare LLC

Laurence D. King (SBN 206423)
 lking@kaplanfox.com
 Linda M. Fong (SBN 124232)
 lfong@kaplanfox.com
 350 Sansome Street, Suite 400
 San Francisco, California 94104
 Telephone: (415) 772-4700
 Facsimile: (415) 772-4707

KAPLAN FOX & KILSHEIMER LLP
 Robert N. Kaplan (*pro hac vice*)
 rkaplan@kaplanfox.com
 850 Third Avenue, 14th Floor
 New York, New York 10022
 Telephone: (212) 687-1980
 Facsimile: (212) 687-7714

STANLEY LAW GROUP
 Stephen Henry Gardner (*pro hac vice*)
 steve@consumerhelper.com
 Amanda Howell (*pro hac vice*)
 ahowell@stanleylawgroup.com
 6116 N. Central Expressway, Suite 1500
 Dallas, Texas 75206
 Telephone: (214) 443-4316
 Facsimile: (214) 447-9469

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

17 COLLEEN GALLAGHER, ILANA FARAR,
 18 ANDREA LOPEZ, JOANN CORDARO, and
 ROSANNE COSGROVE, on behalf of
 themselves and all others similarly situated,

19
 20 Plaintiffs,

21 v.

22
 23 BAYER AG, BAYER CORPORATION, and
 24 BAYER HEALTHCARE LLC,

25 Defendants.
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Case No. 14-cv-04601-WHO

**STIPULATION AND ORDER FOR
 FURTHER EXTENSION OF CASE
 DEADLINES**

1 Pursuant to Civil Local Rule 6-2, the parties stipulate to and jointly request a brief extension
2 of case deadlines.

3 **Procedural History and Prior Extensions.** An initial case management scheduling order
4 was entered on October 16, 2014. Dkt. 5. By stipulation, the Court entered an amended case
5 management scheduling order on December 22, 2014. Dkt. 38. Following an in person meet and
6 confer, on December 11, 2015 the Court entered a revised briefing and discovery schedule. Dkt. 92.

7 On June 7, 2016, Counsel for Plaintiffs Ilana Farar, Andrea Lopez, and Rosanne Cosgrove
8 (“Plaintiffs”) and Counsel for Defendants Bayer AG, Bayer Corporation, and Bayer HealthCare LLC
9 (collectively, “Bayer”) appeared before the Court telephonically to resolve a discovery dispute
10 concerning the scope of Plaintiffs’ Third Requests for Production. Dkt. 115. As part of its ruling,
11 the Court extended the close of fact discovery from May 9, 2016 until July 9, 2016. *Id.*

12 On July 8, 2016 the parties filed a stipulation and proposed order on discovery and
13 scheduling. Dkt. 119. Pursuant to the stipulation, the Court extended the discovery schedule which
14 included extending the close of fact discovery from July 9, 2016 to September 9, 2016. Dkt. 120.

15 On September 6, 2016, Bayer filed a motion for extension of case deadlines to complete
16 discovery which Plaintiffs did not oppose. Dkt. 124. The Court granted the motion and extended all
17 case deadlines by 60 days.

18 **Scheduling of Expert Deposition.** Bayer is seeking to depose Plaintiffs’ expert witness Dr.
19 Blonz. Bayer proposed February 16, 2017 as the date for the deposition; however, Plaintiffs
20 informed Bayer that Dr. Blonz was unavailable on February 16 but was available March 6, 7, 8, or 9.
21 Bayer agreed to schedule the deposition for March 8. Currently, the date for Bayer’s response to
22 Plaintiffs’ class certification motion is March 13, 2017. A brief extension of deadlines is requested
23 to provide Bayer with adequate time to prepare its response brief.

24 **Requested Extension.** The parties respectfully request that the Court extend the following
25 case deadlines as follows:
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<u>Deadline</u>	<u>Current Date</u>	<u>Requested Date</u>
Class Certification Response	March 13, 2017	March 24, 2017
Class Certification Reply	April 27, 2017	May 10, 2017
Class Certification Hearing	May 17, 2017	May 30, 2017

This request does not impact any other deadlines in the case.

1 Dated: February 1, 2017

2 STANLEY LAW GROUP

3 By: /s/ Stephen Gardner

4 Laurence D. King (SBN 206423)

lking@kaplanfox.com

5 Linda M. Fong (SBN 124232)

lfong@kaplanfox.com

6 350 Sansome Street, Suite 400

7 San Francisco, California 94104

Telephone: (415) 772-4700

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10 rkaplan@kaplanfox.com

850 Third Avenue, 14th Floor

11 New York, New York 10022

12 Telephone: (212) 687-1980

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14 -and-

15 STANLEY LAW GROUP

16 Stephen Henry Gardner (admitted pro hac vice)

steve@consumerhelper.com

17 Amanda Howell (admitted pro hac vice)

ahowell@stanleylawgroup.com

18 6116 N. Central Expressway, Suite 1500

Dallas, Texas 75206

19 Telephone: (214) 443-4316

20 Facsimile: (214) 447-9469

Dated: February 1, 2017

SIDLEY AUSTIN LLP

By: /s/ Jonathan F. Cohn

Jonathan F. Cohn (admitted pro hac vice)

jcohn@sidley.com

Benjamin M. Mundel (admitted pro hac vice)

bmundel@sidley.com

SIDLEY AUSTIN LLP

1501 K Street, N.W.

Washington, D.C. 20005

Telephone: (202) 736.8000

Facsimile: (202) 736.8711

Ryan Sandrock (SBN 251781)

rsandrock@sidley.com

SIDLEY AUSTIN LLP

555 California Street, Suite 2000

San Francisco, CA 94104

Telephone: (415) 772.1200

Facsimile: (415) 772.7400

Attorneys for Defendants Bayer AG, Bayer Corporation, and Bayer HealthCare LLC

1 **SIGNATURE ATTESTATION**

2 I am the ECF User whose identification and password are being used to file the foregoing
3 Stipulation and Proposed Order for Further Extension of Case Deadlines. In compliance with Civil
4 Local Rule 5-1(i)(3), I hereby attest that the signatory has concurred in this filing.

5 Dated: February 1, 2017

SIDLEY AUSTIN LLP

7 By:

8 */s/ Jonathan F. Cohn*

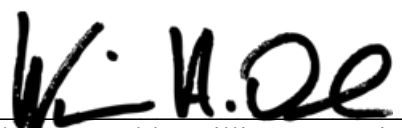
9 Jonathan F. Cohn

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PURSUANT TO STIPULATION, IT IS ORDERED:

- The class certification response deadline is extended from March 13, 2017 to March 24, 2017.
- The class certification reply deadline is extended from April 27, 2017 to May 10, 2017.
- The class certification hearing is continued from May 17, 2017 to May 31, 2017.

Dated: February 2, 2017


The Honorable William H. Orrick
United States District Judge