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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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

Plaintiffs,

v.

BAYER AG, BAYER CORPORATION, and  
BAYER HEALTHCARE LLC,

Defendants.

Case No. 14-cv-04601-WHO

STIPULATED CASE MANAGEMENT  
ORDER

On December 8, 2015, the Court held a case management conference, at which the parties presented an agreement on discovery and scheduling. Consistent with that agreement and the Court's Civil Minutes (Dkt. 90), the Court ORDERS as follows.

1. Defendants shall produce the following documents by January 8, 2016:
  - Additional representative public scientific studies
  - Medical point of view memos
  - Labels
  - Promotional materials (TV, print, radio, point of sale advertisements)
  - Legal/medical/regulatory signoffs
  - FDA notification letters
  - Consumer complaints and responses to consumer complaints

- Sales and financial data
- Names of third-party agents/consultants involved with the products at issue
- Document retention notices and policies

2. With the exception of the public scientific studies, the point of view memos, and the FDA notification letters, Defendants need not produce documents from before October 1, 2010.

3. Plaintiffs shall have until December 18, 2015, to file a Third Amended Complaint for the reasons discussed at the case management conference, or if they so choose, to proceed with the Second Amended Complaint.


4. If the parties cannot reach agreement, they shall file a joint letter brief, not to exceed 10 pages, by January 15, 2016, addressing (1) Plaintiffs' demand for consumer surveys and other market research, and (2) if not mooted by any Third Amended Complaint, Defendants' demand for medical records.

5. Factual discovery and class certification shall proceed as follows:

<b>Event</b>	<b>Date</b>
Close of factual discovery	May 9, 2016
Plaintiffs file opening class brief (and expert report, if any)	July 11, 2016
Defendants file opposition to class certification brief (and expert report, if any)	September 12, 2016
Plaintiffs file reply to class certification	October 27, 2016
Hearing on class certification	November 16, 2016 at 2:00 p.m.

IT IS SO ORDERED.

Date: December 11, 2015

  
 The Honorable William H. Orrick  
 United States District Judge

Filer's Attestation: Pursuant to Local Rule 5-1(i)(3) regarding signatures, the filer hereby attests that concurrence in the filing of this document has been obtained from all parties.