

1 Matthew A. Holian (SBN 211728)
 2 DLA Piper LLP (US)
 3 33 Arch Street, 26th floor
 4 Boston, MA 02110-1447
 5 Telephone: (617) 406-6009
 6 Facsimile: (617) 406-6109
 7 Email: Matt.Holian@dlapiper.com

8 George J. Gigounas (SBN 209334)
 9 DLA Piper LLP (US)
 10 555 Mission Street, Suite 2400
 11 San Francisco, CA 94105-2933
 12 Telephone: (415) 615-6005
 13 Facsimile: (415) 659-7305
 14 Email: George.Gigounas@dlapiper.com

15 Attorneys for Defendant
 16 Pfizer Inc.

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA
 19 SAN FRANCISCO DIVISION

20 DENNIS ANDREWS,

21 Plaintiff,

22 v.

23 PFIZER, INC.

24 Defendant.

Case No.: 3:15-cv-04884-RS

**STIPULATION AND ~~PROPOSED~~
 ORDER CONTINUING DEADLINE TO
 RESPOND TO COMPLAINT**

1 On December 11, 2015, Plaintiff Dennis Andrews, without opposition, moved the
2 Judicial Panel on Multidistrict Litigation (“JPML”) to transfer and coordinate 15 actions,
3 including the instant action and any “tag-along” actions, in the United States District Court for
4 the Northern District of California, pursuant to 28 U.S.C. §1407. Defendants agree that
5 coordination is appropriate and the Northern District of California is a suitable venue. *See Case*
6 *MDL No. 2691, Dkt. 1 through 1-4.*

7 On December 28, 2015, with briefing essentially complete in support of Plaintiff’s
8 unopposed motion to transfer, the parties jointly moved the JPML for expedited consideration of
9 Plaintiff’s unopposed motion on the January 28, 2016 hearing session. *See Case MDL No. 2691,*
10 *Dkt. 16.*

11 On December 29, 2015, the motion for expedited consideration was denied by the JPML.
12 *See Case MDL No. 2691, Dkt. 19.* The next scheduled hearing session for the JPML is March
13 31, 2016.

14 Defendant Pfizer Inc.’s current deadline to respond to the complaint in this matter is
15 January 19, 2016, pursuant to the parties’ one prior stipulation to modify the response date. Dkt
16 19.

17 To avoid unnecessary pleadings and provide the JPML with the time it requires to rule on
18 the parties’ pending motion to transfer, defendant Pfizer Inc. and Plaintiff Dennis Andrews wish
19 to stipulate to extend Pfizer’s deadline to respond to the Complaint until 60 days after a ruling by
20 the JPML on Plaintiff’s motion to transfer.

21 This stipulation will require the Court to reschedule the case management conference
22 currently scheduled for April 14, 2016 at 10:00 A.M. in Courtroom 3 to a later date.

23 Based on the foregoing and pursuant to Local Rule 6-2 of the Northern District of
24 California, the parties stipulate and agree to extend Pfizer’s deadline to respond to Plaintiff’s
25 complaint in this matter until 60 days after the JPML rules on Plaintiff’s motion to transfer,
26 described above.

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DATED: January 19, 2016

By: /s/ B. Kristian W. Rasmussen, III
Rachel B. Abrams (SBN 209316)
Meghan E. McCormick (SBN 283853)
LEVIN SIMES LLP
44 Montgomery Street, 32nd Floor
San Francisco, CA 94104
(415) 426-3000
Fax: (415) 426-3001
Email: rabrams@levinsimes.com
Email: mmccormick@levinsimes.com

B. Kristian W. Rasmussen, III (admitted *pro hac vice*)
CORY WATSON CROWDER & DEGARIS, P.C.
2131 Magnolia Avenue
Birmingham, AL 35205
(205) 328-2200
Fax: (205) 324-7896
Email: Kasmussen@corywatson.com

Attorneys for Plaintiff

DATED: January 19, 2016

By: /s/ Matthew A. Holian
Matthew A. Holian (SBN 211728)
DLA PIPER LLP (US)
33 Arch Street, 26th floor
Boston, MA 02110 -1447
Telephone: (617) 406-6009
Facsimile: (617) 406-6109
Email: Matt.Holian@dlapiper.com

George J. Gigounas (SBN 209334)
DLA PIPER LLP (US)
555 Mission Street Suite 2400
San Francisco, California 94105-2933
Telephone: (415) 615-6005
Facsimile: (415) 659-7305
Email: George.Gigounas@dlapiper.com

Attorneys for Pfizer Inc.


ORDER

PURSUANT TO STIPULATION OF THE PARTIES, IT IS ORDERED:

The time for Defendant Pfizer Inc. to respond to Plaintiff’s complaint in this action is continued until sixty calendar days after the Judicial Panel on Multidistrict Litigation (“JPML”) issues its ruling on Plaintiff’s pending motion to transfer and coordinate 15 actions, including the instant action and any “tag-along” actions, in the United States District Court for the Northern District of California, pursuant to 28 U.S.C. §1407.

The case management conference currently scheduled in this case for April 14, 2016 at 10:00 A.M. in Courtroom 3 will be rescheduled to a date as determined and ordered by this Court.

Dated: 1/19 _____, 2016

By: 

Honorable Richard Seeborg
United States District Court Judge

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