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15 Attorneys for Defendant  
 16 Pfizer Inc.

17 [SEE ADDITIONAL COUNSEL ON NEXT PAGE]

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

21 JOAO DELGADO,  
 22  
 23 Plaintiff,  
 24  
 25 v.  
 26  
 27 PFIZER, INC.  
 28  
 29 Defendant.

Case No.: 3:16-cv-01464-~~EMC~~ RS

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

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Attorneys for Plaintiff

1 Plaintiff and Defendant stipulate that the date for Defendant to respond to the Complaint  
2 shall be extended to April 30, 2016. In support of this request, the parties state:

3 This is one of a number of lawsuits filed in various federal courts alleging that the  
4 plaintiff's use of Viagra caused him to develop melanoma. On December 11, 2015, several of  
5 these plaintiffs filed a petition with the Judicial Panel on Multidistrict Litigation ("JPML"),  
6 requesting that all such lawsuits be coordinated for pretrial purposes in an MDL proceeding, and  
7 suggesting that the MDL be established in the Northern District of California.

8 On December 22, 2015, Defendant responded to the petition, agreeing that an MDL  
9 proceeding would be appropriate and that the Northern District of California would be an  
10 appropriate venue for the MDL.

11 Plaintiff's petition was heard at the JPML hearing on March 31, 2016 in Santa Barbara,  
12 California. To date, the JPML has not issued a decision on the coordination of these lawsuits.

13 To ensure that the Court and the parties do not needlessly expend resources before the  
14 JPML decides which court and judge will preside over the expected MDL proceeding, the parties  
15 believe it is sensible to extend the time for Defendant to respond to Plaintiff's Complaint to April  
16 30, 2016. By that date, the parties expect that an MDL proceeding will be established, and that  
17 the MDL court will later establish a global process for the filing of and responses to complaints.

18  
19 DATED: April 1, 2016

By:           /s/ Rachel B. Abrams            
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*Attorneys for Plaintiff*

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27 DATED: April 1, 2016

By:           /s/ Matthew A. Holian            
Matthew A. Holian (SBN 211728)  
DLA PIPER LLP (US)

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*Attorneys for Defendant Pfizer Inc.*




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**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 April 30, 2016.

Dated: 4/5, 2016

By:   
Honorable ~~Edward M. Chen~~ Richard Seeborg  
United States District Court Judge