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12 Attorneys for Defendants

13 BRISTOL-MYERS SQUIBB COMPANY,  
 14 ASTRAZENECA PHARMACEUTICALS LP,  
 and MCKESSON CORPORATION

15 **IN THE UNITED STATES DISTRICT COURT**

16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

17 CAROLYN WILLIAMS, an individual, et al.,

18 Plaintiffs,

19 v.

20 ASTRAZENECA PHARMACEUTICALS  
 LP, et al.,

21 Defendants.

Case No.: 3:16-CV-07152-JST

22 **STIPULATION FOR ORDER TO  
 CONTINUE DEADLINE TO SUBMIT  
 PROPOSED ORDERS PURSUANT TO  
 N.D. CAL. CIV. L.R. 6-1**

Judge: Honorable Jon S. Tigar

23 AND RELATED ACTION:

24 *Michael Martin, et al. v. AstraZeneca  
 Pharmaceuticals LP, et al.,*  
 25 Case No. 4:17-cv-00661-JST;

26  
 27 WHEREAS, at the July 12, 2017 Case Management Conference, the Court ordered that  
 28 the parties submit (a) a proposed protective order, (b) a proposed order regarding claims of

STIPULATION FOR ORDER TO CONTINUE DEADLINE TO SUBMIT PROPOSED ORDERS  
 PURSUANT TO N.D. CAL. CIV. L.R. 6-1 - 3:16-CV-07152-JST

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1 privilege, and (c) a proposed order governing the production of Electronically Stored  
2 Information in the above-entitled and related-action by Friday, August 4, 2017;

3 WHEREAS, at the July 12, 2017 Case Management Conference, Defendants raised the  
4 issue that the Court may not have subject matter jurisdiction over these claims in light of the  
5 Court's rulings remanding the related actions *Okoye, et al. v. Bristol-Myers Squibb Company, et*  
6 *al.* Case No. 3:17-cv-00668-JST [Doc. 24] and *Leedy, et al. v. Bristol-Myers Squibb Company, et*  
7 *al.* Case No. 3:16-cv-07269-JST [Doc. 36];

8 WHEREAS, the parties are meeting and conferring regarding the issue of subject-matter  
9 jurisdiction, and how best to raise that issue with the Court;

10 WHEREAS, the above-entitled and related-action are the only remaining related actions  
11 before the Court;

12 WHEREAS, the parties believe that it would benefit judicial economy and efficiency to  
13 address the issue of subject-matter jurisdiction before submitting the above-described proposed  
14 orders, because if the Court lacks jurisdiction, any further efforts of the Court and the parties  
15 would be wasted;

16 **NOW, THEREFORE, the Parties stipulate as follows:**

17 The August 4, 2017 deadline by which the parties are to submit the above-described  
18 proposed orders be continued to August 18, 2017.

19 **IT IS SO STIPULATED.**

20 DATED: August 4, 2017

SANDERS PHILLIPS GROSSMAN, LLC

21  
22  
23 By: /s/ Lauren Welling  
24 Timothy M. Clark  
25 Lauren Welling  
26 Attorneys for Plaintiffs  
27  
28

1 DATED: August 4, 2017

KING & SPALDING LLP

2  
3 By: /s/ William E. Steimle  
4 Donald F. Zimmer, Jr.  
5 William E. Steimle  
6 Attorneys for Defendants

7 **Signature Attestation (N.D. Cal. L.R. 5-1(i)(3))**

8 I, Lauren Welling, attest that concurrence in the filing of this document has been obtained  
9 from each signatory whose ECF user ID and password are not being used in the electronic filing  
10 of this document.

11  
12 Having considered Plaintiffs' and Defendants AstraZeneca Pharmaceuticals LP, Bristol-  
13 Myers Squibb Company, and McKesson Corporation's (collectively, the Parties') Stipulation for  
14 Order to Continue the August 4, 2017 deadline by which the parties are to submit the above-  
15 described proposed orders, and good cause appearing, the Parties' Stipulation is **GRANTED**.

16 The August 4, 2017 deadline to submit proposed orders is continued to August 18, 2017.

17  
18 **IT IS SO ORDERED.**

19  
20  
21 DATED: August 7, 2017 \_\_\_\_\_

  
22 HONORABLE JON S. TIGGER  
23 United States District Judge