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10 Attorneys for Defendants
 11 PFIZER INC. and MEDIVATION, INC. 2015 SEVERANCE PLAN

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN FRANCISCO/OAKLAND DIVISION

16 TINA SAMPATH,
 17 Plaintiff,
 18 vs.
 19 PFIZER INC., MEDIVATION, INC.
 20 2015 SEVERANCE PLAN,
 21 Defendants.

) CASE NO.: 3:17-CV-04851-EMC
) [Related to Case No. 17-cv-05997-EMC]

) **STIPULATION AND [PROPOSED]**
) **ORDER TO REQUEST (1) A**
) **CONTINUANCE OF THE HEARING**
) **DATE; AND (2) AN EXTENSION OF**
) **TIME RELATED TO THE BRIEFING**
) **SCHEDULE FOR PLAINTIFF TINA**
) **SAMPATH’S MOTION TO DISMISS**
) **DEFENDANT PFIZER’S**
) **COUNTERCLAIMS**

) Complaint Filed: August 21, 2017
) Trial Date: Not Set

27 Pursuant to the Northern District of California Local Rule (“Local Rule”) No. 6-2, Plaintiff Tina
 28 Sampath (“Plaintiff”) and Defendants Pfizer Inc. and Medivation, Inc. 2015 Severance Plan

1 (“Defendants”) (collectively, the “Parties”), by and through their respective attorneys of record, hereby
2 request by stipulation the following:

3 1. A continuance of the hearing date related to Plaintiff’s Motion to Dismiss Defendant
4 Pfizer’s Counterclaims filed on November 22, 2017 (ECF No. 26) (the “Motion”) and an extension to
5 the briefing schedule related to the same. Pursuant to Local Rule No. 7-3(a), (c), any opposition to a
6 motion must be filed and served not more than fourteen (14) days after the motion was filed and a reply
7 must be filed seven (7) days after the opposition. Accordingly, as it relates to the Motion at issue,
8 Defendant Pfizer’s opposition would be due on December 6, 2017, and Plaintiff’s reply, December 13,
9 2017.

10 2. The Parties are conferring about a possible resolution of Plaintiff’s Motion and Defendant
11 Pfizer’s counterclaims. Defendants must carefully review the documents filed under seal as part of
12 Plaintiff’s Motion to assess the arguments in Plaintiff’s Motion. The Parties wish to discuss a resolution
13 of Plaintiff’s Motion and Defendant Pfizer’s counterclaims prior to Defendants’ devoting substantial
14 time to preparing a response to Plaintiff’s Motion.

15 3. The Parties have not made any previous requests to modify the case schedule.

16 4. Accordingly, the Parties now hereby request a continuance of the hearing date and
17 briefing schedule so that the Parties can continue their discussion of a possible resolution.

18 5. The current briefing schedule is as follows:

- 19 • **Motion Filed:** November 22, 2017
- 20 • **Deadline to file Opposition to Motion:** December 6, 2017
- 21 • **Deadline to file Reply to Motion:** December 13, 2017

22 6. The Parties request the following briefing schedule with a potential hearing date of
23 January 25, 2018, or as soon thereafter as the Court’s calendar would allow:

- 24 • **Deadline to file Opposition to Motion:** December 27, 2017
- 25 • **Deadline to file Reply to Motion:** January 10, 2018

26 7. Should the Parties resolve this issue prior to the newly proposed hearing date, then
27 Plaintiff will contact the Court’s calendar clerk so that the January 25, 2018 hearing date, or other date
28 selected by the Court, can be taken off calendar.

1 8. The Parties also request that the Court reset the Initial Case Management Conference for
2 January 25, 2018, or other date selected by the Court.

3 **IT IS SO STIPULATED.**

4 Dated: December 4, 2017

FEINBERG, JACKSON, WORTHMAN &
WASOW LLP

6
7 By: s/Daniel M. Feinberg
 Daniel M. Feinberg
8 Attorneys for Plaintiff
 TINA SAMPATH

9 Dated: December 4, 2017

JACKSON LEWIS P.C.

10
11 By: s/Samantha N. Hoffman
 Samantha N. Hoffman
 Rassa L. Ahmadi
12 Attorneys for Defendants
13 PFIZER INC., MEDIVATION, INC. 2015
14 SEVERANCE PLAN

1 **ORDER**

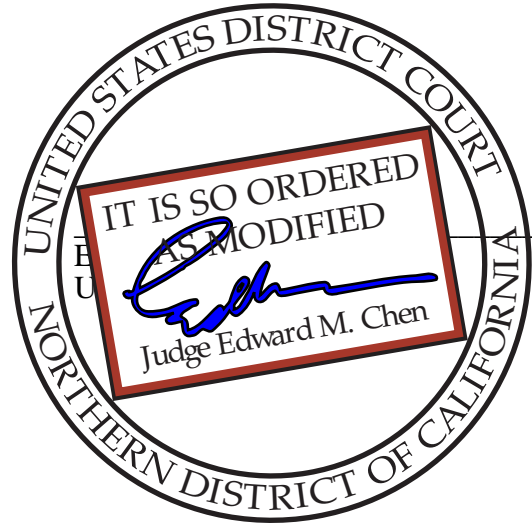
2 The Parties having so stipulated and good cause appearing, it is hereby ORDERED as follows:

3 The briefing schedule for Plaintiff Tina Sampath's Motion to Dismiss ("Motion") set for hearing on
4 1/25, 2018 is as follows:

- 5 • **Deadline to file Opposition to Motion:** December 27, 2017
- 6 • **Deadline to file Reply to Opposition:** January 10, 2018
- 7 • **The Initial Case Management Conference is reset for Jan. 25, 2018 at 1:30 PM in**
8 **Courtroom 5, 17th Floor, San Francisco.**

9
10 **IT IS SO ORDERED.**

11
12 Dated: 12/5/17



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15 4838-2096-2648, v. 1