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7 Attorneys for Defendants  
 BioMarin Pharmaceutical Inc., Jean-Jacques Bienaimé,  
 8 Brian R. Mueller, and Henry J. Fuchs

9  
 10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

12  
 13 In re BioMarin Pharmaceutical Inc.  
 14 Securities Litigation

Case No. 3:20-cv-06719-WHO

15 STIPULATION AND [PROPOSED] ORDER TO  
 16 RESCHEDULE MOTION TO DISMISS  
 17 HEARING

18  
 19 Lead Plaintiff Arbejdsmarkedets Tillægspension (“ATP” or “Lead Plaintiff”) and Defendants  
 20 BioMarin Pharmaceutical Inc., Jean-Jacques Bienaimé, Brian R. Mueller, and Henry J. Fuchs  
 21 (“Defendants”) (collectively with ATP, the “Parties”) stipulate and agree as follows:

22 WHEREAS, on December 22, 2020, the Court issued an order appointing ATP Lead Plaintiff  
 23 in the above-referenced action pursuant to the Private Securities Litigation Reform Act of 1995;

24 WHEREAS, on February 22, 2021, Lead Plaintiff filed an Amended Class Action Complaint;

25 WHEREAS, on April 22, 2021, Defendants filed a Motion to Dismiss Plaintiff’s Amended  
 26 Class Action Complaint and a Motion Hearing was set for September 8, 2021 at 2:00 p.m.;

27 WHEREAS, on June 22, 2021, Lead Plaintiff filed an Opposition to Defendants’ Motion to  
 28 Dismiss the Amended Class Action Complaint;

1           WHEREAS, on July 22, 2021, Defendants filed a Reply in Support of the Motion to Dismiss  
2 Plaintiff's Amended Class Action Complaint;

3           WHEREAS, on August 30, 2021, the Court entered a Clerk's Notice ("Order") resetting the  
4 September 8, 2021 Motion Hearing to September 15, 2021 at 2:00 p.m.;

5           WHEREAS, counsel for Defendants have a professional conflict and will be unavailable for  
6 the rescheduled Motion Hearing;

7           WHEREAS, counsel for Defendants have another matter that is set for trial in the Northern  
8 District of California and will be unavailable for the duration of the trial;

9           WHEREAS, counsel for Defendants and for Lead Plaintiff have met and conferred and, at the  
10 request of counsel for Defendant and without objection from counsel for Lead Plaintiff, agreed to seek  
11 a continuance of the Motion Hearing from September 15, 2021 to November 17, 2021 at 2:00 p.m. or  
12 another date that is convenient for the Court.

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1 NOW THEREFORE, the Parties, by and through their undersigned counsel, agree and stipulate  
2 to the following, subject to the Court's approval:

3 1. The Motion Hearing scheduled for September 15, 2021 at 2:00 p.m. shall be  
4 rescheduled to November 17, 2021 at 2:00 p.m.

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6 IT IS SO STIPULATED.

7 Dated: September 8, 2021

COOLEY LLP

8  
9 /s/ Jessica Valenzuela Santamaria  
10 Jessica Valenzuela Santamaria (220934)  
11 John C. Dwyer (136533)  
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18 Attorneys for Defendants  
19 BioMarin Pharmaceutical Inc., Jean-Jacques  
20 Bienaimé, Brian R. Mueller, and Henry J.  
21 Fuchs  
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1 Dated: September 8, 2021

BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP

2  
3 /s/ Katherine M. Sinderson

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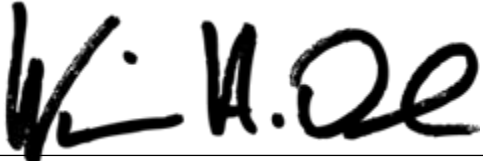
20 Lead Counsel for Lead Plaintiff and the Class

21 \* \* \*

22 ORDER

23 IT IS SO ORDERED.

24 DATED: September 8, 2021

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27 THE HONORABLE WILLIAM H. ORRICK  
28 UNITED STATES DISTRICT JUDGE

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ATTESTATION PURSUANT TO CIV. L.R. 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatories.

Dated: September 8, 2021

/s/ Jessica Valenzuela Santamaria  
Jessica Valenzuela Santamaria