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12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**  
 14 **OAKLAND DIVISION**

15 SMITHKLINE BEECHAM CORPORATION )  
 d/b/a/ GLAXOSMITHKLINE, )  
 16 )  
 Plaintiff, )  
 17 )  
 v. )  
 18 )  
 ABBOTT LABORATORIES, )  
 19 )  
 Defendant. )  
 20 )  
 21 )  
 22 )  
 23 )  
 24 )

**Case No. C07-5702 (CW)**  
*Related per November 19, 2007 Order to*  
**Case No. C-04-1511 (CW)**

**STIPULATION EXTENDING  
 DEADLINES FOR FILING  
 DECLARATIONS IN SUPPORT OF  
 ADMINISTRATIVE MOTIONS TO FILE  
 UNDER SEAL RELATING TO ABBOTT'S  
 MOTIONS FOR SUMMARY JUDGMENT**

**Date: N/A**  
**Time: N/A**  
**Courtroom: N/A**  
**Judge: Hon. Claudia Wilken**

25 *(Caption continued on next page.)*  
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SAFEWAY INC., *et al.*,  
Plaintiff,  
v.  
ABBOTT LABORATORIES,  
Defendant.

) Case No. C07-5470 (CW)  
) Related per November 19, 2007 Order to  
) Case No. C04-1511 (CW)

MEIJER, INC. & MEIJER DISTRIBUTION,  
INC., *et al.*,  
Plaintiff,  
v.  
ABBOTT LABORATORIES,  
Defendant.

) Case No. C07-5985 (CW)  
) (Consolidated Cases)  
) Related per November 30, 2007 Order to  
) Case No. C04-1511 (CW)

RITE AID CORPORATION, *et al.*,  
Plaintiff,  
v.  
ABBOTT LABORATORIES,  
Defendant.

) Case No. C07-6120 (CW)  
) Related per December 5, 2007 Order to  
) Case No. C04-1511 (CW)

1           WHEREAS, on July 30, 2010, Defendant Abbott Laboratories (“Abbott”) filed a motion  
2 for summary judgment addressing the claims made by Plaintiffs Rite Aid Corp., *et al.*, Meijer,  
3 Inc., *et al.*, and Safeway Inc., *et al.* (collectively “Direct Purchaser Plaintiffs”), and a motion for  
4 summary judgment addressing the claims made by Plaintiff GlaxoSmithKline (“GSK”);

5           WHEREAS, along with Abbott’s motions, Abbott lodged declarations attaching numerous  
6 confidential documents designated by Abbott, Plaintiffs, and non-party Bristol-Myers Squibb  
7 (“BMS”) as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the protective  
8 orders in these cases;

9           WHEREAS, pursuant to Northern District of California Civil Local Rules 7-11 and 79-5,  
10 in conjunction with the lodging of parties’ documents under seal, Abbott filed motions for  
11 administrative relief addressing those materials that Abbott seeks to seal;

12           WHEREAS, under Local Rule 79-5(d), if a designating party wishes to maintain its  
13 designated materials under seal, it must timely file a supporting declaration and proposed order  
14 within seven days;

15           WHEREAS, all parties anticipate that Plaintiffs’ oppositions, like Abbott’s motions, will  
16 entail administrative motions under Local Rules 7-11 and 79-5 addressing a large volume of  
17 documents;

18           WHEREAS, for the reasons stated in the accompanying declarations of Trevor V.  
19 Stockinger and of Stephanie S. McCallum, the parties believe they need more time to prepare the  
20 submissions required by Local Rule 79-5 and agree that allowing parties and non-parties  
21 additional time to file those submissions would not delay the progress of these cases.

22 **IT IS HEREBY STIPULATED AND AGREED:**

23           1.       The parties request additional time for filing declarations in support of  
24 administrative motions to file under seal materials lodged in connection with Abbott’s motions for  
25 summary judgment.

26           2.       The parties propose that the deadlines for parties and non-parties to submit  
27 supporting declarations and proposed orders (as specified by Local Rule 79-5(d)) be extended for  
28

1 materials associated with Abbott's motions for summary judgment and Plaintiffs' oppositions  
2 thereto.

3           3.       The parties specifically propose that supporting declarations and proposed orders  
4 sealing materials lodged by Abbott on August 2, 2010 be submitted by designating parties and  
5 non-parties no later than August 13, 2010.

6           4.       Additionally, the parties specifically propose that declarations and proposed orders  
7 sealing materials that will be lodged by Direct Purchaser Plaintiffs and GSK on August 27, 2010  
8 be submitted by designating parties and non-parties no later than September 9, 2010.

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