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11 [ADDITIONAL ATTORNEYS ON SIGNATURE PAGE]  
 12

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

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

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

**STIPULATION REGARDING PRE-TRIAL EXCHANGES AND TRIAL PROCEDURES**

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

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 26 *(Caption continued on next page.)*  
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1 SAFEWAY INC., *et al* )  
2 Plaintiff, )  
3 v. )  
4 ABBOTT LABORATORIES , )  
5 Defendant. )  
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7 )  
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**Case No. C07-5470 (CW)**  
*Related per November 19, 2007 Order to Case No. C-04-1511 (CW)*

**STIPULATION REGARDING PRE-TRIAL EXCHANGES AND TRIAL PROCEDURES**

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

9 MEIJER, INC. & MEIJER DISTRIBUTION, )  
10 INC., *et al.*, )  
11 Plaintiff, )  
12 v. )  
13 ABBOTT LABORATORIES , )  
14 Defendant. )  
15 )  
16 )

**Case No. C07-5985 (CW)**  
*Related per November 3, 2007 Order to Case No. C-04-1511 (CW)*

**STIPULATION REGARDING PRE-TRIAL EXCHANGES AND TRIAL PROCEDURES**

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

17 RITE AID CORPORATION, *et al.*, )  
18 Plaintiff, )  
19 v. )  
20 ABBOTT LABORATORIES , )  
21 Defendant. )  
22 )  
23 )  
24 )

**Case No. C07-6120 (CW)**  
*Related per December 5, 2007 Order to Case No. C-04-1511 (CW)*

**STIPULATION REGARDING PRE-TRIAL EXCHANGES AND TRIAL PROCEDURES**

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

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1 WHEREAS, the Direct Purchaser plaintiffs,<sup>1</sup> plaintiff SmithKline Beecham d/b/a  
2 GlaxoSmithKline, and defendant Abbott Laboratories (“Abbott”) seek to enter into agreements to  
3 increase the efficiency of, and better manage, pre-trial exchanges and disclosures in Case Nos.  
4 C07-5702 (CW), 07-5470 (CW), 07-5985 (CW), and 07-6120 (CW) (the “related cases”);

5 WHEREAS, the parties believe the following arrangements would be convenient and  
6 efficient for not only the parties but for the Court as well;

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

8 1. Any party planning to use a demonstrative at trial will disclose a copy of that  
9 demonstrative to the opposing party no less than 72 hours before that demonstrative’s anticipated  
10 use at trial. After a demonstrative has been disclosed, no changes to that demonstrative are  
11 permitted absent consent or Court approval other than non-substantive corrections (*e.g.*,  
12 corrections of typographic errors). Magnifications of quotations from or other portions of  
13 documents disclosed on exhibit lists, callouts of quotations or other portions of those documents,  
14 or similar emphasis of quotations or other portions of those documents, do not constitute  
15 demonstratives and will not be subject to this disclosure agreement.

16 2. All motions and related documents required under Local Rule 79-5 to support the  
17 sealing of confidential documents submitted during the course of the trial will not be due from the  
18 submitting party until 30 days after the conclusion of trial. If a party has submitted information  
19 designated confidential by another party, the declaration from the designating party required by  
20 Local Rule 79-5(d) to support the sealing of that information will be not be due until 40 days after  
21 the conclusion of trial.

22 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD:**

23  
24 /s/ Alexander F. Wiles  
Alexander F. Wiles  
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1800 Avenue of the Stars, Suite 900  
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25 /s/ Stephanie S. McCallum  
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Chicago, IL 60601

26  
27 *Counsel for GSK*

*Counsel for Abbott Laboratories*

28 <sup>1</sup> Plaintiffs in Case Nos. 07-5470 (CW), 07-5985 (CW), and 07-6120 (CW).

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/s/ Scott E. Perwin  
Scott E. Perwin  
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/s/ Daniel Simons  
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*Counsel for the District Purchaser Class*

/s/ Monica L. Rebuck  
Monica L. Rebuck  
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*Counsel for Rite Aid Corp., et al.*

Pursuant to General Order No. 45, Section X, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the above signatories.

Dated: January 1, 2011 /s/ S. Albert Wang  
S. Albert Wang  
IRELL & MANELLA LLP  
*Counsel for GSK*

**PURSUANT TO STIPULATION, PARAGRAPH 1 IS SO ORDERED; PARAGRAPH 2 IS REJECTED AS INFEASIBLE.**

Dated: 1/6/2011  
  
Judge Claudia Wilken  
United States District Court