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3/21/2011

Attorneys for Plaintiffs Esther and Emilio Carranza

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN JOSE DIVISION

14 ESTHER CARRANZA, EMILIO  
 15 CARRANZA

16 Plaintiff,

17 v.

18 WYETH LLC, {An indirect wholly-owned  
 19 subsidiary of Pfizer Inc.} PHARMACIA &  
 20 UPJOHN COMPANY LLC (An indirect  
 21 wholly-owned subsidiary of Pfizer Inc.)

22 Defendants.

] Case No. 5:04-CV-04161-JW

] STIPULATION TO CONTINUE DATES  
 ] FOR FILING CASE MANAGEMENT  
 ] STATEMENT AND CASE  
 ] MANAGEMENT CONFERENCE,  
 ] DECLARATION OF PHILIP C.  
 ] BOURDETTE IN SUPPORT OF  
 ] STIPULATION AND {PROPOSED}  
 ] ORDER

] Date: April 4, 2011

] Time: 10:00 AM

] Courtroom 8 – Judge James Ware

24 IT IS HEREBY STIPULATED BY & BETWEEN ALL PARTIES THAT:

- 25
- 26 1. The date for Filing a Case Management Statement is continued from  
 27 March 25, 2011 to June 10, 2011.  
 28



1 District of California and five others still pending in the Multi District Litigation Court in Little  
2 Rock, Arkansas. Before Ms. Farrise can make an appearance, pursuant to State Bar regulations  
3 our clients have to sign addenda to our retainer agreement authorizing this association and  
4 setting forth the division of fees. The calendars set by the courts will impact Ms. Farrise's  
5 calendar so she needs to be part of the process to set all dates in the Case Management  
6 Statements and the Case Management Conferences in San Jose and/or Scheduling Conferences  
7 in Fresno.

8 3. Bourdette & Partners has a priority trial (Elder Abuse) set for May 9, 2011 in  
9 Tulare County Superior Court. The Discovery deadline is April 8, 2011 and is proceeding at a  
10 feverish pace. The trial is expected to take approximately eight court days. Since I am doing  
11 most of the pretrial work, I lack time to do anything else, including meet and confer and  
12 prepare a Joint Case Management Statement.

13 4. It is for these reasons that we proposed and defendants agreed to the continuance  
14 requested above.

15 I declare under penalty of perjury and under the laws of the State of California that the  
16 foregoing is true. Executed this 17<sup>th</sup> day of March, 2011.

17 /s/ Philip C. Bourdette  
18 Philip C. Bourdette

19  
20 **IT IS SO ORDERED:**

21 The parties' Stipulation to continue the Conference for these related cases for nearly sixty days  
22 is DENIED because the parties have not articulated good cause sufficient to justify such an an  
23 extended continuance.

24 **Dated:** March 21, 2011

25 James Ware  
26 Honorable James Ware, Chief Judge  
27 United States District Court  
28 Northern District of California