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 21 UNITED STATES DISTRICT COURT
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 23 NORTHERN DISTRICT OF CALIFORNIA
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 25 SAN JOSE DIVISION
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21 ESTHER CARRANZA et al,
 22 ALICE FERNANDEZ, et al.,
 23 MARY OROZCO, et al.,

23 Plaintiffs,

24 vs.

25 Wyeth LLC, et al.,

26 Defendants.
 27

No. 5:04-CV-04161-EJD
 No. 5:10-CV-05924-EJD
 No. 5:10-CV-05928-EJD

**STIPULATION, SUPPORTING
 DECLARATION OF MIRIAM
 BOURDETTE AND PROPOSED
 ORDER TO CONTINUE SELECTED
 PRETRIAL DATES**

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

- 2 1. The pre-trial dates set in the Court's Scheduling Order dated July 6, 2011 be
3 continued to the dates set forth below for the reasons stated in the declaration of
4 Miriam Bourdette: Deadlines apply to all three cases unless otherwise noted.

5 5/7/12: Fact Discovery Deadline

6 6/1/12: Exchange of Expert Disclosures & Reports

7 6/8/12: Last Day to File Consolidation and Bifurcation Motions

8 6/29/12: Exchange of Rebuttal Expert Disclosures & Reports

9 6/29/12: Joint Pretrial Conference Statement (*Fernandez and Orozco*)

10 7/6/12: Consolidation / Bifurcation Motion Hearing at 9:00 AM

11 7/6/12: Preliminary Pretrial Conference at 11:00 AM (*Fernandez and Orozco*)

12 6/29/12 Last day to file Joint Interim Case Management Conference Statement (Carranza)

13 7/6/12 Interim Case Management Conference (Carranza)

- 14
15 2. The following dates set in the July 11 Order will remain as ordered:

16 8/10/12: Expert Discovery Cut-off

17 8/31/12: Dispositive and *Daubert* Motions Filing deadline

18 9/21/12: Hearing on Anticipated Dispositive & *Daubert* Motions at 9:00 AM

19 10/19/12: Joint Pretrial Conference Statement (*Carranza*)

20 10/26/12: Final Pretrial Conference (*Carranza*)

21 11/5/12: Trial (*Carranza*)

Respectfully submitted,

DATED: March 14, 2012

BOURDETTE AND PARTNERS

By /s/ Miriam Bourdette
Miriam Bourdette
Attorneys for Plaintiff

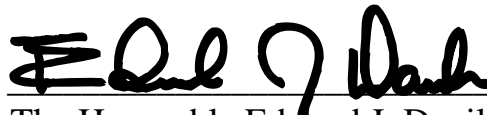
DATED: March 14, 2012

KAYE SCHOLER LLP

By: /s/ Wendy S. Dowse
Wendy S. Dowse
Attorneys for Defendants

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: March 22, 2012


The Honorable Edward J. Davila
United States District Court
Northern District of California

1 cases. Scheduling has been very difficult as it involves availability of experts, doctors, parties'
2 lawyers, doctor's lawyers. There still are billing records, medical records and physical
3 evidence (mammography films and pathology slides) that have not been obtained, further
4 complicating the scheduling. Without all billing and medical records and physical evidence it
5 is near impossible to prepare plaintiffs properly for their depositions, to provide doctors (many
6 of whom are retired or have purged their own files since the care was provided so many years
7 ago) and their attorneys copies of the charts about which they are to be deposed, or experts with
8 materials on which to make final reports. Neither defendants nor plaintiffs could foresee the
9 difficulty in obtaining the records or the impact of Judge Goodwin's Orders on the discovery
10 process in the three cases pending before this Court.
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13 4. It is for these reasons that we stipulate to the continuances requested above and hope
14 for relief as stated in the Stipulation.
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16 I declare under penalty of perjury and under the laws of the State of California that the
17 foregoing is true. Executed this 14th day of March, 2012.
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20 /s/ Miriam Bourdette
21 Miriam Bourdette
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