Doc. 19

This Joint Stipulated Request for an Order Changing the Deadline for IDEO LP to Produce a Rule 30(b)(6) Deponent is made on behalf of IDEO LP ("IDEO"), as well as Sanofi-Aventis U.S. LLC and Sanofi-Aventis Deutschland GmbH (collectively "Sanofi"). On March 31, 2015, this Court denied in part and granted in part IDEO's motion to quash a deposition subpoena issued on behalf of Sanofi, and ordered IDEO to produce a Rule 30(b)(6) deponent, on topics approved by the Court, by April 21, 2015 for examination by Sanofi. IDEO and Sanofi have cooperated with each other, and with Eli Lilly and Company ("Lilly"), which is in litigation with Sanofi, but were unable to find a mutually available time to conduct the deposition. IDEO and Sanofi have agreed to a deposition in Chicago, IL on April 22, 2015. Lilly is available at that time and place as well. There have been no previous requested modifications to this Court's deadline for IDEO to produce a deponent, and an extension to this Court's deadline for IDEO to produce a Rule 30(b)(6) deponent would not affect the schedule for the case.

Accordingly, IDEO and Sanofi jointly request that this Court's deadline for IDEO to produce a Rule 30(b)(6) deponent be extended to April 22, 2015.

Dated: April 9, 2015

FREDERICK BROWN GIBSON, DUNN & CRUTCHER LLP

By: /s/ Frederick Brown

Frederick Brown

FREDERICK BROWN, SBN 65316

Y. ERNEST HSIN, SBN 201688

Attorneys for Sanofi-Aventis U.S. LLC and Sanofi-

Aventis Deutschland GmbH

| 1 | |
|----|--|
| 2 | GREGORY K. KLINGSPORN JORGENSON, SIEGEL, MCCLURE & FLEGEL, LLP |
| 3 | |
| 4 | By: /s/ Gregory K. Klingsporn |
| 5 | Gregory K. Klingsporn |
| 6 | GREGORY K. KLINGSPORN, SBN 203649 |
| 7 | NICOLAS A. FLEGEL, SBN 229360 |
| 8 | Attorneys for IDEO LP |
| 9 | |
| 10 | ORDER CHANGING TIME |
| 11 | Pursuant to stipulation, and good cause showing, IDEO shall produce a 30(b)6 deponent by |
| 12 | April 22, 2015. |
| 13 | |
| 14 | SO ORDERED. |
| 15 | |
| 16 | Dated: April 10, 2015 Paul S. Grewal |
| 17 | UNITED STATES MAGISTRATE JUDGE |
| 18 | |
| 19 | |
| 20 | |
| 21 | |
| 22 | |
| 23 | |
| 24 | |
| 25 | |
| 26 | |
| 27 | |
| 28 | |
| | 3 |

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in

compliance with Civil Local Rule 5.1, and will be served on all counsels of record who have

 Dated: April 9, 2015

consented to electronic service in accordance with Civil Local Rule 5.1 via the Court's ECF system. By: /s/ Wendy Zhu Wendy Zhu