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

13 **RICHARD CONNELLY,**

14 **Plaintiff,**

15 **v.**

16 **ST. JUDE MEDICAL, INC., a Minnesota**  
 17 **corporation; ABBOTT LABORATORIES**  
 18 **AS THE SUCCESSOR IN INTEREST TO**  
 19 **ST. JUDE MEDICAL, INC., an Illinois**  
 20 **corporation; and PACESETTER, INC.,**  
 21 **dba St. Jude Cardiac Rhythm**  
 22 **Management Division, a Delaware**  
 23 **corporation,**

24 **Defendants.**

Case No. 5:17-cv-02006-EJD

25 **STIPULATION AND [~~PROPOSED~~] ORDER**  
 26 **EXTENDING DEADLINES FOR**  
 27 **OPPOSITION AND REPLY ON**  
 28 **DEFENDANTS' MOTION TO DISMISS**

Complaint Filed: April 11, 2017

1 WHEREAS, on April 11, 2017, Plaintiff Richard Connelly (“Plaintiff”) filed a Complaint  
2 in the above-captioned matter;

3 WHEREAS, on June 23, 2017, Defendants St. Jude Medical, Inc., Abbott Laboratories,  
4 and Pacesetter, Inc. (collectively, “Defendants”) filed a Motion to Dismiss all claims in  
5 Plaintiff’s Complaint, set for hearing on August 17, 2017;

6 WHEREAS, Plaintiff’s Opposition papers are currently due on July 7, 2017, with  
7 Defendants’ Reply papers currently due on July 14, 2017; and

8 WHEREAS, given the July 4, 2017 national holiday, Plaintiff and Defendants agree a  
9 continuance of the deadlines to file Opposition and Reply papers, respectively, is warranted.

10 NOW, THEREFORE, IT IS HEREBY STIPULATED AS FOLLOWS:

- 11 1. Plaintiff’s Opposition papers to Defendants’ Motion to Dismiss are due on July 14,  
12 2017.
- 13 2. Defendants’ Reply papers in support of their Motion to Dismiss are due on July 28,  
14 2017.
- 15 3. Hearing on Defendants’ Motion to Dismiss shall proceed as calendared on August 17,  
16 2017.

17  
18 Dated: June 26, 2017

**COTCHETT, PITRE & McCARTHY, LLP**

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20 By: /s/ Camilo Artiga-Purcell  
**CAMILO ARTIGA-PURCELL**

*Attorneys for Plaintiff*

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23  
24 Dated: June 26, 2017

**COTCHETT, PITRE & McCARTHY, LLP**

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26 By: /s/ Daniel L. Ring  
**DANIEL L. RING**

*Attorneys for Defendants*

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**ATTESTATION OF FILING**

I, Camilo Artiga-Purcell, hereby attest, pursuant to Northern District of California, Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from each signatory hereto.

  
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**CAMILO ARTIGA- PURCELL**

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**[PROPOSED] ORDER**

The above STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINES FOR OPPOSITION AND REPLY ON DEFENDANTS' MOTION TO DISMISS is approved and all parties shall comply with its provisions as follows:

1. Plaintiff's Opposition papers to Defendants' Motion to Dismiss are due on July 14, 2017.
2. Defendants' Reply papers in support of their Motion to Dismiss are due on July 28, 2017.
3. Hearing on Defendants' Motion to Dismiss shall proceed as calendared on August 17, 2017.

[In addition, the Court makes the further orders stated below:]

IT IS SO ORDERED

Dated: July 5, 2017

  
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HON. EDWARD J. DAVILA