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Attorneys for McKinsey Defendants

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

IN RE: MCKINSEY & CO., INC. NATIONAL  
PRESCRIPTION OPIATE CONSULTANT  
LITIGATION

This Document Relates to: ALL ACTIONS

Case No. 3:21-md-02996-CRB (SK)

[Assigned to the Hon. Charles R. Breyer]

**STIPULATION AND ~~[PROPOSED]~~  
ORDER REGARDING PAGE LIMITS  
FOR BRIEFING ON INITIAL MOTIONS  
TO DISMISS**

**STIPULATION**

WHEREAS, the Court previously entered a briefing schedule directing McKinsey to file initial motions to dismiss by December 23, 2020; Plaintiffs to file oppositions to the motions to dismiss by February 14, 2022; and McKinsey to file reply briefs by March 21, 2022 (Dkt. 282);

WHEREAS, given the multiple categories of Plaintiffs and the number of states from which complaints originated, the issues McKinsey intends to raise by its motions to dismiss McKinsey believes cannot be addressed adequately within the number of pages contemplated by the local rules and this Court's standing orders;

WHEREAS, the parties have met and conferred about extending page limits given these limitations;

WHEREAS, the parties have agreed on extending page limits for McKinsey's opening brief in support of its motion to dismiss for lack of personal jurisdiction, Plaintiffs' brief in opposition to that motion, and McKinsey's reply brief in support of that motion;

WHEREAS, the parties have also agreed on an extended page limit for McKinsey's opening brief in support of its motion to dismiss based on the effect of McKinsey's settlement with the state Attorneys General, but Plaintiffs wish to review the motion before determining how many pages they will need to oppose the motion;

NOW, THEREFORE, the parties hereby agree and stipulate to the following page limits for McKinsey's motions to dismiss:

Motion to dismiss for lack of personal jurisdiction

Opening Brief: 30 pages

Opposition Brief: 30 pages

Reply Brief: 20 pages

Motion to dismiss based on effect of AG settlement

Opening Brief: 45 pages

Opposition Brief: To be determined

Reply Brief: To be determined

IT IS SO STIPULATED.

Dated: December 16, 2021

STROOCK & STROOCK & LAVAN LLP  
DAVID M. CHEIFETZ

By: /s/ David M. Cheifetz  
David M. Cheifetz

Attorneys for Defendants

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LLP  
ELIZABETH J. CABRASER


By: /s/ Elizabeth J. Cabraser  
Elizabeth J. Cabraser

Lead Counsel for Plaintiffs

~~PROPOSED~~ ORDER

Pursuant to stipulation, and for good cause shown, IT IS SO ORDERED.

DATED: December 17, 2021

  
CHARLES R. BREYER  
UNITED STATES DISTRICT JUDGE