I	Case 3:21-md-02996-CRB Document 469	Filed 02/01/23 Page 1 of 3
1 2	Elizabeth J. Cabraser (SBN 083151) ecabraser@lchb.com LIEFF CABRASER HEIMANN & BERNSTEIN,	James L. Bernard ( <i>Pro Hac Vice</i> ) jbernard@stroock.com
3	LLP 275 Battery Street, 29th Floor	STROOCK & STROOCK & LAVAN LLP 180 Maiden Lane
4	San Francisco, CA 94111-3339 Telephone: 415.956.1000	New York, NY 10038 Telephone: 212.806.5400
5	Facsimile: 415.956.1008	Josh A. Cohen (SBN 217853)
6	Lead Counsel for Plaintiffs	jcohen@clarencedyer.com CLARENCE DYER & COHEN LLP
7		899 Ellis Street San Francisco, CA 94109
8		Telephone: 415.749.1800
9		Mark David McPherson (SBN 307951)
10		mmcpherson@mofo.com MORRISON & FOERSTER LLP
11		425 Market Street
12		San Francisco, CA 94105 Telephone: 415.268.7000
13		Ingrid S. Martin (Pro Hac Vice)
14		imartin@toddweld.com TODD & WELD LLP
15		One Federal Street
16		Boston, MA 02110 Telephone: 617.720.2626
17		Attorneys for McKinsey Defendants
18	UNITED STATES DISTRICT COURT	
19	NORTHERN DISTRICT OF CALIFORNIA	
20		
21	IN RE: MCKINSEY & CO., INC. NATIONAL PRESCRIPTION OPIATE	Case No. 21-md-02996-CRB (SK)
22	CONSULTANT LITIGATION	STIPULATION AND [ <del>PROPOSED]</del> ORDER TO CONTINUE DEADLINE FOR
23		DISPUTES REGARDING DISCOVERY FROM MDL 2804
24	ALL ACTIONS	Judge: Hon. Charles R. Breyer
25		Courtroom: 6, 17th Floor
26		
27		
28		

I	Case 3:21-md-02996-CRB Do	ocument 469 Filed 02/01/23 Page 2 of 3	
1	STIPULATION		
2	WHEREAS, pursuant to the October 27, 2022 Joint Case Management Statement and		
3	Discovery Schedule ("Discovery Schedule"), the parties are required to meet and confer and		
4	submit any disputes concerning Defendants' access to discovery from MDL 2804 to Magistrate		
5	Judge Kim (Dkt. 440);		
6	WHEREAS, the parties previously agreed to extend the deadline for the submission of		
7	any such disputes from December 20, 2022 to February 3, 2023 (Dkts. 454 & 464);		
8	WHEREAS, the parties continue to discuss issues pertaining to MDL 2804 discovery and		
9	Defendants' access thereto;		
10	NOW, THEREFORE, the parties hereby agree, stipulate and respectfully request that the		
11	Discovery Schedule be amended to provide that the parties shall submit any disputes concerning		
12	access to discovery from MDL 2804 to Magistrate Judge Kim on or before March 3, 2023.		
13	The parties further hereby agree and stipulate that all other terms and provisions in the		
14	Discovery Schedule that are not expressly modified herein shall remain as provided therein.		
15	IT IS SO STIPULATED.		
16			
17	Dated: January 31, 2023	By: <u>/s/</u>	
18		Elizabeth J. Cabraser ecabraser@lchb.com	
19		LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP	
20		275 Battery Street, 29th Floor San Francisco, CA 94111-3339	
21		Telephone: (415) 956-1000	
22		$E_{accimile}$ (415) 056 1008	
		Facsimile: (415) 956-1008	
23		Facsimile: (415) 956-1008 Plaintiffs' Lead Counsel and on behalf of the Plaintiffs' Steering Committee	
		Plaintiffs' Lead Counsel and on behalf of the	
23		Plaintiffs' Lead Counsel and on behalf of the	
23 24		Plaintiffs' Lead Counsel and on behalf of the	
23 24 25		Plaintiffs' Lead Counsel and on behalf of the	

