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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. 21-md-02996-CRB (SK)

SECOND STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
PRIVILEGE PROTOCOL

Judge: Hon. Charles R. Breyer

Courtroom: 6, 17th Floor

STIPULATION

WHEREAS, pursuant to the October 27, 2022 Joint Case Management Statement and Discovery Schedule (“Discovery Schedule”), this Court directed the parties to meet and confer and submit to the Court a joint proposed protocol on privilege issues (or, if the parties cannot agree, separate proposed protocols with supporting memoranda) on or before January 19, 2023 (Dkt. 440);

WHEREAS, the parties previously agreed to extend the deadline for submission of the joint proposed protocol to the Court to February 7, 2023 (Dkt. 465);

WHEREAS, the parties have met and conferred and have narrowed the issues before them regarding the joint proposed protocol;

WHEREAS, the parties continue to discuss the joint proposed protocol and respectfully seek additional time to resolve or narrow any remaining disputes;

WHEREAS, the Discovery Schedule states that submission of a privilege protocol to the Court shall not delay Defendants’ initial production of discovery called for under Paragraph III.e.i of the Discovery Schedule, and WHEREAS that production is in fact underway;

NOW, THEREFORE, the parties hereby agree, stipulate and respectfully request that the Discovery Schedule be amended to provide that the parties shall submit to the Court a joint proposed protocol on privilege issues (or, if the parties cannot agree, separate proposed protocols with supporting memoranda) on or before February 24, 2023.

The parties further hereby agree and stipulate that all other terms and provisions in the Discovery Schedule that are not expressly modified herein shall remain as provided therein.

IT IS SO STIPULATED.

Dated: February 13, 2023

By: /s/ Elizabeth J. Cabraser

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~~[PROPOSED]~~ ORDER

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

DATED: February 13, 2023


CHARLES R. BREYER
United States District Judge