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11 12 13 14		TODD & WELD LLP INGRID S. MARTIN ( <i>PRO HAC VICE</i> ) One Federal Street Boston, MA 02110 Telephone: 617.720.2626 Email: imartin@toddweld.com
15	Attorneys for McKinsey Defendants	
16	UNITED STATES DISTRICT COURT	
17	NORTHERN DISTRICT OF CALIFORNIA	
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>	IN RE: MCKINSEY & CO., INC. NATIONAL PRESCRIPTION OPIATE CONSULTANT LITIGATION This Document Relates to: ALL ACTIONS	<ul> <li>Case No. 3:21-md-02996-CRB (SK)</li> <li>[Assigned to the Hon. Charles R. Breyer]</li> <li>STIPULATION AND <del>[PROPOSED]</del></li> <li>ORDER REGARDING STAY OF</li> <li>MAGISTRATE JUDGE'S DISCOVERY</li> <li>ORDER PENDING MCKINSEY'S RULE</li> <li>72 MOTION</li> </ul>
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## STIPULATION

2	WHEREAS, on March 10, 2023, the parties to this MDL jointly submitted to Magistrate		
3	Judge Kim a discovery dispute relating to Plaintiffs' Requests for Production seeking copies of all		
4	materials McKinsey produced to regulators or government entities, as well as copies of subpoenas,		
5	CIDs, and related communications (Dkt. 487);		
6	WHEREAS, on March 17, 2023, Magistrate Judge Kim issued a written order directing		
7	McKinsey to produce the disputed materials by April 15, 2023 (Dkt. 489, pp. 2-3);		
8	WHEREAS, on March 20, 2023, McKinsey advised Plaintiffs that McKinsey intends to		
9	seek this Court's review of Judge Kim's ruling by way of a motion pursuant to Federal Rule of		
10	Civil Procedure 72(a) filed on or before March 31, 2023, and McKinsey asked Plaintiffs if they		
11	would consent to a stay of Judge Kim's ruling pending this Court's review;		
12	WHEREAS, Plaintiffs advised McKinsey that they do not object to a stay of Judge Kim's		
13	ruling pending this Court's review;		
14	NOW, THEREFORE, the parties hereby agree and stipulate that Judge Kim's order		
15	directing McKinsey to produce documents produced to regulators and government entities, as well		
16	as subpoenas, CIDs, and related communications, should be stayed pending this Court's review of		
17	McKinsey's Rule 72 motion, which motion McKinsey shall file on or before March 31, 2023.		
18	IT IS SO STIPULATED.		
19	Dated: March 28, 2023CLARENCE DYER & COHEN LLP		
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21	By: <u>/s/</u>		
22	Josh A. Conen		
23	Attorneys for Defendants		
24	ELIZABETH J. CABRASER		
25	By:		
26	Elizabeth J. Cabraser		
27	Lead Counsel for Plaintiffs		
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2	[PROPOSED] ORDER
3	Pursuant to stipulation, and for good cause shown, IT IS SO ORDERED.
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5	DATED: March 30, 2023
6	CHARLES R. BREYER UNITED STATES DISTRICT JUDGE
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