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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 TRIBAL CASES

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

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE DEADLINE TO
SUBMIT PROPOSED TRIBAL
BELLWETHER PROTOCOL

Judge: Hon. Charles R. Breyer

Courtroom: 6, 17th Floor

1 **STIPULATION**

2 WHEREAS, on April 6, 2023, this Court approved and issued a Supplemental Schedule
3 governing certain discovery and trial matters (ECF No. 505);

4 WHEREAS, Section III of the Supplemental Schedule provides that, with respect to the
5 Tribal Plaintiffs, the parties shall meet and confer and submit a proposed bellwether protocol (or
6 competing proposals if they cannot agree on a protocol) by April 14, 2023;

7 WHEREAS, the parties have begun the meet and confer process but anticipate that they
8 will need a short amount of additional time to finalize a proposed bellwether protocol for
9 submission to the Court or finalize competing proposals;

10 NOW, THEREFORE, the parties hereby stipulate that the deadline set out in Section III of
11 the Supplemental Schedule be extended by seven days, to April 21, 2023. The parties further
12 stipulate that by April 21, 2023, they will meet and confer and submit a proposed bellwether
13 protocol. If the parties are unable to agree, then each shall submit its own proposal with a
14 memorandum (not to exceed five pages) explaining why the Court should adopt that party's
15 proposal.

16 **IT IS SO STIPULATED.**

17
18 Dated: April 13, 2023

19
20 By: /s/ Elizabeth J. Cabraser

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By: /s/ Josh A. Cohen (with permission)

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~~PROPOSED~~ ORDER

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

DATED: April 14, 2023


CHARLES R. BREYER
United States District Judge