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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, the parties stipulated and this Court issued an Order on April 14, 2023,
5 amending the Supplemental Schedule to provide that, with respect to the Tribal Plaintiffs, the
6 parties shall meet and confer and submit a proposed bellwether protocol (or competing proposals
7 if they cannot agree on a protocol) by April 21, 2023 (ECF No. 516);

8 WHEREAS, the parties are engaged in the meet and confer process and have exchanged
9 drafts of proposed bellwether protocols but anticipate that they will need a short amount of
10 additional time to finalize a proposed bellwether protocol for submission to the Court, or finalize
11 competing proposals;

12 NOW, THEREFORE, the parties hereby stipulate that the deadline to submit a proposed
13 tribal bellwether protocol be extended by five days, to April 26, 2023. If the parties are unable to
14 agree, then each shall submit its own proposal with a memorandum (not to exceed five pages) on
15 April 26, 2023, by 5:00 p.m. PDT explaining why the Court should adopt that party's proposal.

16 **IT IS SO STIPULATED.**

17
18 Dated: April 20, 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 21, 2023



CHARLES R. BREYER
United States District Judge