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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)

**STIPULATION AND ORDER RE
INTERROGATORY LIMITS**

Magistrate Judge: Hon. Sallie Kim

STIPULATION

The Parties hereby agree, stipulate, and respectfully request that the limitations imposed by Fed. R. Civ. P. 33(a)(1) (limiting interrogatories to 25 per party) be lifted, and that Plaintiffs collectively may propound 50 interrogatories to the McKinsey Defendants, and Defendants collectively may propound 25 interrogatories to each Neonatal Abstinence Syndrome (“NAS”) Plaintiff, each named Third-Party Payor (“TPP”) Plaintiff,¹ each Tribal Plaintiff selected as a trial bellwether, and each Plaintiff that is not a NAS Plaintiff, a TPP Plaintiff, or a Tribal Plaintiff.

IT IS SO STIPULATED.

Dated: May 4, 2023

By: /s/Elizabeth J. Cabraser

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*Plaintiffs’ Lead Counsel and on behalf of the
Plaintiffs’ Steering Committee*

¹ Although McKinsey agrees not to seek discovery from TPP plaintiffs not named in the consolidated class action complaint at this time, McKinsey reserves all rights, including but not limited to the right to seek discovery from those plaintiffs in the future, either before or after the Court rules on any motion for class certification. *See* Suppl. Schedule, at 2 n.2 (ECF No. 505).

By: /s/Josh A. Cohen

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ORDER

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

DATED: May 5, 2023


The Honorable Sallie Kim
United States Magistrate Judge