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18	UNITED STATES	DISTRICT COURT
19	NORTHERN DISTR	ICT OF CALIFORNIA
20		
21	IN RE: MCKINSEY & CO., INC. NATIONAL PRESCRIPTION OPIATE	Case No. 21-md-02996-CRB (SK)
22	CONSULTANT LITIGATION	STIPULATION AND [PROPOSED] ORDER TO CONTINUE DEADLINE FOR
23	This Document Relates to:	SUBMISSION OF SEARCH PROTOCOL
24	ALL ACTIONS	Judge: Hon. Charles R. Breyer
25		Courtroom: 6, 17th Floor
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STIPULATION TO CONTINUE DEADLINE FOR SEARCH PROTOCOL CASE NO. 3:21-MD-02996-CRB (SK)

1	STIPULATION	
2	WHEREAS, pursuant to the Supplemental Discovery Schedule entered by the Court on	
3	April 6, 2023, the deadline for the parties to submit to Magistrate Judge Kim an agreed-upon	
4	discovery search protocol (or competing protocols) is April 24, 2023, or 2 weeks after Plaintiffs'	
5	receipt of a hit report, whichever is later (Dkt. 505);	
6	WHEREAS, McKinsey produced, and Plaintiffs received, a hit report on April 17, 2023,	
7	such that the original deadline for submission of a search protocol was May 1, 2023;	
8	WHEREAS, pursuant to stipulation, the Court extended the submission deadline to May	
9	19, 2023 (Dkt. 536);	
10	WHEREAS, the parties continue to discuss an appropriate search protocol and the search	
11	terms to be applied pursuant to that protocol;	
12	NOW, THEREFORE, the parties hereby agree, stipulate and respectfully request that the	
13	Supplemental Discovery Schedule be amended to provide that the parties shall submit an agreed-	
14	upon search protocol (or competing proposals) on or before May 26, 2023.	
15	The parties further hereby agree and stipulate that all other terms and provisions in the	
16	Supplemental Discovery Schedule that are not expressly modified herein shall remain as provided	
17	therein.	
18	IT IS SO STIPULATED.	
19	Dated: May 18, 2023 By: /s/	
20	By	
21	Elizabeth J. Cabraser ecabraser@lchb.com	
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25	Plaintiffs' Lead Counsel and on behalf of the	
26	Plaintiffs' Steering Committee	
27		
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1	By:/s/	
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7	Attorney for McKinsey Defendants	
8		
9		
10	[PROPOSED] ORDER	
11	Pursuant to stipulation, and for good cause shown, IT IS SO ORDERED.	
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13	DATED: May 19, 2023 CHARLES R. BREYER	
14	United States District Judge	
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