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On Signature Page]*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: MCKINSEY & CO., INC.
NATIONAL PRESCRIPTION OPIATE
CONSULTANT LITIGATION

This Document Relates to:

ALL NAS ACTIONS

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

**NAS PLAINTIFFS' UNOPPOSED
MOTION FOR EXTENSION OF TIME TO
FILE AMENDED COMPLAINT**

ORDER

Judge: Charles R. Breyer

1 Pursuant to Civil Local Rule 6-3, NAS Plaintiffs respectfully move the Court for a 14-day
2 extension of time (until August 24, 2023) to file their amended complaint.

3 On July 20, 2023, the Court issued an order granting the McKinsey Defendants' motion to
4 dismiss the NAS Master Complaint. Doc. 573. In the Order, the Court granted NAS Plaintiffs 21
5 days (until August 10, 2023) to amend their complaint. *Id.* at 15. NAS Plaintiffs submit that the
6 Court's granting them an extension of time until August 24, 2023 to file their amended complaint
7 will not unduly delay this proceeding or impact case deadlines, and will allow the NAS Plaintiffs
8 the necessary time to decide how to respond to the Court's order. This is the NAS Plaintiffs' first
9 motion for an extension of time filed in this matter.

10 Defendants have agreed to this extension request.

11
12 Dated: August 4, 2023

Respectfully submitted,

13 By: /s/ Scott R. Bickford

14 Scott R. Bickford

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18 *PSC Member – NAS Children*
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DECLARATION OF COUNSEL

I, Scott Bickford, declare and state as follows:

1. I am an attorney at Martzell, Bickford & Centola and counsel for NAS Plaintiffs in this action.

I am a member in good standing of the State Bars of Louisiana, Texas and Colorado and am admitted *pro hac vice* in this action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein. I submit this Declaration in support of NAS Plaintiffs' unopposed motion for an extension of time to file amended complaint.

2. On August 3, 2023, I requested in writing that the McKinsey Defendants stipulate to NAS Plaintiffs filing the instant motion.

4. On August 4, 2023, counsel for McKinsey Defendants responded in writing to NAS Plaintiffs' request, stating that McKinsey Defendants had no objection.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 4, 2023, in New Orleans, LA.

/s/ Scott Bickford

Scott Bickford

[~~PROPOSED~~ ORDER]

Considering the foregoing NAS Plaintiffs' Unopposed Motion for an Extension of Time to File Amended Complaint, the Motion is hereby GRANTED.

IT IS SO ORDERED.

Dated: August 7, 2023


HONORABLE CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE