

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BAXTER HEALTHCARE CORPORATION,)	
)	
)	
Plaintiff,)	
)	C.A. No. 18-303-RGA
v.)	
)	
HOSPIRA, INC. and ORION CORP.,)	
)	
Defendants.)	

**STIPULATION AND [PROPOSED] ORDER
REGARDING EXTENSION OF FACT DISCOVERY**

WHEREAS, fact discovery closes November 15, 2018 (D.I. 21);

WHEREAS Plaintiff Baxter Healthcare Corporation (“Plaintiff”) and Defendants Hospira, Inc. and Orion Corp. (collectively, “Defendants”) are discussing extending that deadline and other dates in the schedule, but have not agreed on all dates;

WHEREAS under either party’s proposal, fact discovery would continue to at least April 1, 2019;

WHEREAS the parties request, subject to the Court’s approval, that the fact discovery deadline be provisionally extended until April 1, 2019 and after the parties complete their discussions on the rest of the new schedule, the parties will inform the Court of the requested new schedule or whether they have disputes;

NOW THEREFORE, IT IS HEREBY STIPULATED by Plaintiff and Defendants, subject to the approval of the Court, that the deadline to complete fact discovery is extended to April 1, 2019.

Dated: November 14, 2018

POTTER ANDERSON & CORROON LLP

CONNOLLY GALLAGHER LLP

By: /s/ Philip A. Rovner

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Attorneys for Defendants

SO ORDERED this ____ day of November, 2018

THE HONORABLE RICHARD G. ANDREWS
UNITED STATES DISTRICT JUDGE