

Crotty, P.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Kowa Company, Ltd.,
Kowa Pharmaceuticals America, Inc., and
Nissan Chemical Industries, Ltd.,

Plaintiffs,

v.

Amneal Pharmaceuticals, LLC,

Defendants.

Civil Action No. 14-CV-2758 (PAC)

Kowa Company, Ltd.,
Kowa Pharmaceuticals America, Inc., and
Nissan Chemical Industries, Ltd.,

Plaintiffs,

v.

Mylan Inc. and Mylan Pharmaceuticals Inc.,

Defendants.

Civil Action No. 14-CV-2647 (PAC)

Kowa Company, Ltd.,
Kowa Pharmaceuticals America, Inc., and
Nissan Chemical Industries, Ltd.,

Plaintiffs,

v.

Zydus Pharmaceuticals (USA) Inc., and Cadila
Healthcare Ltd. (dba Zydus Cadila),

Defendants.

Civil Action No. 14-CV-2760 (PAC)

Kowa Company, Ltd.,
Kowa Pharmaceuticals America, Inc., and
Nissan Chemical Industries, Ltd.,

Plaintiffs,

v.

Orient Pharma Co., Ltd.,

Defendants.

Civil Action No. 14-CV-2759 (PAC)

Kowa Company, Ltd.,
Kowa Pharmaceuticals America, Inc., and
Nissan Chemical Industries, Ltd.,

Plaintiffs,

v.

Sawai USA, Inc., and
Sawai Pharmaceutical Co., Ltd.,

Defendants.

Civil Action No. 14-CV-5575 (PAC)

Kowa Company, Ltd.,
Kowa Pharmaceuticals America, Inc., and
Nissan Chemical Industries, Ltd.,

Plaintiffs,

v.

Apotex, Inc. and Apotex Corp.,

Defendants.

Civil Action No. 14-CV-7934 (PAC)

Kowa Company, Ltd.,
Kowa Pharmaceuticals America, Inc., and
Nissan Chemical Industries, Ltd.,

Plaintiffs,

v.

Lupin Ltd. and Lupin Pharmaceuticals, Inc.

Defendants.

Civil Action No. 15-CV-3935 (PAC)

STIPULATION AND ORDER EXTENDING DISCOVERY DEADLINES


IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the undersigned parties, subject to the approval and order of the Court, that the following discovery deadlines set forth under the Civil Case Management Plan and Scheduling Order entered by the Court on October 17, 2014 (*see* ECF No. 43, in Civil Action No. 14-cv-2497) and February 23, 2015 (*see* ECF No. 38, in Civil Action No. 14-cv-7934) as amended most recently by the Court's Order of January 19, 2016 (ECF No. 53, in Civil Action No. 14-cv-7934), (collectively, "10/17/14 Scheduling Order"), and the Civil Case Management Plan and Scheduling Order entered by the Court on February 2, 2016 (*see* ECF No. 20, in Civil Action No. 15-cv-3935), in

the above-captioned actions be modified as follows:

Event	Current Deadline	Proposed Modified Deadline
• Fact Discovery – depositions of fact witnesses to be completed no later than:	February 29, 2016	April 6, 2016
• Close of fact discovery	February 29, 2016	April 6, 2016
• Deadline for counsel to meet and confer to discuss settlement	March 11, 2016	April 4, 2016
• Expert Discovery: opening expert reports due:	March 18, 2016	April 15, 2016
• Expert Discovery: responsive expert reports due:	April 29, 2016	May 20, 2016
• Expert Discovery: reply expert reports due:	May 26, 2016	June 17, 2016
• Expert Discovery: all expert discovery, including depositions, to be completed no later than:	June 28, 2016	July 22, 2016
• Deadline to file a letter seeking leave to file dispositive motions	June 28, 2016	August 19, 2016
• Final Pretrial Submission Date	July 27, 2016	August 26, 2016
• Trial		September 2016, or at the Court's earliest convenience

The parties to Civil Action No. 15-cv-3935 have not previously requested or received any extensions. The parties to the remaining cases have previously requested and received four extensions to the first two foregoing deadlines, and up to four extensions for the following deadlines. Those parties have made twelve total previous requests for extension with regard to certain deadlines in the 10/17/14 Scheduling Order, which the Court granted.

Dated: February 28, 2016



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Respectfully submitted,

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