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14 **UNITED STATES DISTRICT COURT**  
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 IN RE INCRETIN-BASED  
17 THERAPIES PRODUCTS LIABILITY  
18 LITIGATION

19 *This Document Relates to All Cases*

Case No. 3:13-MD-02452-AJB-MDD

**DEFENDANTS' UNOPPOSED  
MOTION FOR EXTENSION OF  
TIME TO FILE REPLIES IN  
SUPPORT OF MOTIONS TO SEAL  
RELATING TO THE CROSS-  
MOTIONS FOR SUMMARY  
JUDGMENT ON THE  
AFFIRMATIVE DEFENSE OF  
PREEMPTION**

Judge: Hon. Anthony J. Battaglia  
Magistrate: Hon. Mitchell D. Dembin

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25 Defendants Amylin Pharmaceuticals, LLC, Eli Lilly and Company, Merck Sharp  
26 & Dohme Corp., and Novo Nordisk, Inc. (collectively, "Defendants") move for an  
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Case No. 13md2452 AJB (MDD)

DEFS.' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLIES IN SUPPORT OF  
MOTIONS TO SEAL

1 extension of time to respond to Plaintiffs' Opposition to Defendants' Motions to Seal  
2 Documents for Preemption Motions, and request that they be given until September 15,  
3 2015 to do so. In support of their motion, Defendants state as follows:

4 1. On July 24, 2015, the Court issued an Order granting the parties' Joint  
5 Motion to Establish a Schedule for Filing of Comprehensive Memoranda In Support of  
6 All Motions to Seal Relating to the Cross-Motions for Summary Judgment on the  
7 Affirmative Defense of Preemption (ECF No. 1250).

8 2. Pursuant to that Order, Defendants are due to file replies in support of their  
9 motions to seal on September 11, 2015.

10 3. Counsel for the parties have conferred regarding the September 11, 2015  
11 reply deadline, and Defendants have proposed extending the deadline to September 15,  
12 2015. Plaintiffs have represented that they do not oppose Defendants' motion for  
13 extension of time.

14 4. Accordingly, Defendants respectfully request an order granting this Motion  
15 and extending the time for Defendants' replies to September 15, 2015.

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18 Respectfully submitted,

19 Dated: September 10, 2015

RICHARD B. GOETZ  
AMY J. LAURENDEAU  
O'MELVENY & MYERS LLP

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22 By: /s/ Amy J. Laurendeau  
23 Amy J. Laurendeau  
24 Attorneys for Defendant  
25 Amylin Pharmaceuticals, LLC  
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27

Case No. 13md2452 AJB (MDD)

DEFS.' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLIES IN SUPPORT OF  
MOTIONS TO SEAL

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20 By: /s/ Heidi Levine  
21 Heidi Levine  
22 Attorneys for Defendant  
23 Novo Nordisk Inc.

24 **SIGNATURE ATTESTATION**

25 I hereby certify that authorization for the filing of this document has been obtained  
26 from each of the other signatories shown above and that all signatories concur in the  
27 filing's content.

/s/ Amy J. Laurendeau

Case No. 13md2452 AJB (MDD)

DEFS.' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLIES IN SUPPORT OF  
MOTIONS TO SEAL

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 10th day of September 2015, I have electronically filed  
3 the foregoing document with the Clerk of Court using the CM/ECF system, which will  
4 automatically send an email notification to participants in the case who are registered  
5 CM/ECF users.

6  
7 /s/ Amy J. Laurendeau  
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Case No. 13md2452 AJB (MDD)

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