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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

IN RE INCRETIN-BASED
THERAPIES PRODUCTS LIABILITY
LITIGATION

As to All Related and Member Cases

Case No. 13md2452 AJB (MDD)

**AGREED MOTION FOR LEAVE
TO FILE ADDITIONAL PAGES
FOR DEFENDANTS' COMBINED
REPLY IN SUPPORT OF THEIR
MOTIONS TO SEAL THE
PARTIES' SUMMARY JUDGMENT
MEMORANDA ON THE
AFFIRMATIVE DEFENSE OF
PREEMPTION AND
ACCOMPANYING EXHIBITS**

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

Defendants respectively move, pursuant to Local Rule 7.1(h), for leave to file additional pages as part of their combined reply in support of their Motions to Seal the Parties' Summary Judgment Memoranda on the Affirmative Defense of Preemption

1 and Accompanying Exhibits. Plaintiffs do not object to the extension. Defendants
2 state the following in support:

3 1. On August 21, 2015, Defendants each filed a motion to seal the parties'
4 summary judgment memoranda on the affirmative defense of preemption and certain
5 accompanying exhibits. *See* ECF Nos. 1337–1340.

6 2. On September 4, 2015, Plaintiffs filed a single reply in opposition to
7 these motions. *See* ECF No. 1404.

8 3. In order to avoid multiple duplicative filings, Defendants wish to file a
9 combined reply in support of their motions to seal. Because Defendants each would
10 be allowed to file a separate 10-page reply under Local Rule 7.1(h), Defendants seek
11 to file, and Plaintiffs do not object to Defendants filing, a combined reply of up to 15
12 pages.

13 4. A proposed order will be e-mailed to chambers in accordance with the
14 Court's Standing Order for Civil Cases.

15
16 Respectfully submitted:

17 Dated: September 15, 2015

RYAN L. THOMPSON
WATTS GUERRA LLP

18
19
20 By: /s/ Ryan L. Thompson

Ryan L. Thompson
Plaintiffs' Counsel

21
22
23 Dated: September 15, 2015

HUNTER J. SHKOLNIK
NAPOLI BERN RIPKA SHKOLNIK

24
25
26 By: /s/ Hunter J. Shkolnik

Hunter J. Shkolnik
Plaintiffs' Counsel

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Dated: September 15, 2015

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By: /s/ Tor A. Hoerman
Tor A. Hoerman
Plaintiffs' Counsel

Dated: September 15, 2015

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Dated: September 15, 2015

LOREN BROWN
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By: /s/ Heidi Levine

Heidi Levine
Attorneys for Defendant
Novo Nordisk Inc.

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SIGNATURE ATTESTATION

Pursuant to Section 2.f.4 of the Court’s CM/ECF Administrative Policies, I hereby certify that authorization for the filing of this document has been obtained from each of the other signatories shown above and that all signatories have authorized placement of their electronic signature on this document.

By: s/ Ana C. Reyes
Ana C. Reyes