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Attorneys for Defendants and Counterclaim Plaintiffs
GENENTECH, INC. and CITY OF HOPE

IN THE UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

SANOFI-AVENTIS U.S. LLC and REGENERON PHARMACEUTICALS, INC.,

Plaintiffs,

v.

GENENTECH, INC., and CITY OF HOPE

Defendants.

GENENTECH, INC., and CITY OF HOPE,

Counterclaim Plaintiffs,

v.

SANOFI-AVENTIS U.S. LLC and REGENERON PHARMACEUTICALS, INC.,

Counterclaim Defendants.

Case No. 2:15-CV-05685-GW-AGR

JOINT MOTION TO EXPEDITE REVIEW OF MAGISTRATE'S MARCH 31, 2016 ORDER

Date: TBD
Time: TBD
Ctrm: B, 8th Floor, Spring Street
Judge: George H. Wu

Fact discovery cutoff: April 1, 2016
Pretrial Conference: Sept. 8, 2016
Trial: Sept. 27, 2016

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Plaintiffs Sanofi-Aventis U.S. LLC ("Sanofi-Aventis") and Regeneron Pharmaceuticals, Inc. ("Regeneron"), and Defendants Genentech, Inc. ("Genentech") and City of Hope jointly move to expedite briefing and hearing on Defendants' Motion to Review Magistrate Judge Rosenberg's March 31, 2016 Order requiring Genentech and City of Hope to produce certain settlement agreements ("Motion to Review").

Good cause exists for expedited consideration and resolution of Defendants' motion because the documents at issue are relevant to damages considerations in the case and opening expert reports on damages are due on April 15, 2016. Responsive reports are due on May 13, 2016. In order to minimize the impact of Defendants' Motion to Review on the remaining dates in the schedule, namely expert discovery and summary judgment, set by the Court, the parties have agreed to an expedited briefing schedule as follows:

- Genentech and City of Hope's opening brief – filed concurrently herewith on April 6, 2016
- Sanofi and Regeneron's opposition brief – filed no later than April 11, 2016
- Any reply brief by Genentech and City of Hope – filed no later than April 12, 2016

The parties respectfully request that the Court adopt these agreed-upon deadlines and hear Defendants' Motion for Review on April 14, 2016. An expedited hearing date will allow for the current schedule for expert reports to remain in place.

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Respectfully submitted,

Dated: April 6, 2016

DURIE TANGRI LLP

By: */s/ Adam R. Brausa*
ADAM R. BRAUSA

Attorneys for Defendants and Counterclaim Plaintiffs GENENTECH, INC. and CITY OF HOPE

Dated: April 6, 2016

MAYER BROWN LLP

By: */s/ Elizabeth D. Mann*
ELIZABETH D. MANN

Attorneys for Plaintiffs and Counterclaim Defendants SANOFI-AVENTIS U.S. LLC and REGENERON PHARMACEUTICALS, INC.

FILER'S ATTESTATION

Pursuant to Civil L.R. 5-4.3.4, regarding signatures, I, Adam R. Brausa, attest that concurrence in the filing of this document has been obtained.

/s/ Adam R. Brausa
ADAM R. BRAUSA

CERTIFICATE OF SERVICE

I certify that all counsel of record is being served on April 6, 2016 with a copy of this document via the Court's CM/ECF system.

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