(All parties and counsel listed on Signature Page)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TAKEDA PHARMACEUTICAL CO., LTD., TAKEDA PHARMACEUTICALS NORTH AMERICA, INC., TAKEDA PHARMACEUTICALS LLC, AND TAKEDA PHARMACEUTICALS AMERICA, INC., Plaintiffs, v. HANDA PHARMACEUTICALS, LLC, Defendant.	Case No. 3:11-cv-00840 JCS **STIPULATION AND [~~PROPOSED~~] ORDER REGARDING POST-MARKMAN SCHEDULE** Judge: Hon. Joseph C. Spero Courtroom G, 15th Floor
TAKEDA PHARMACEUTICAL CO., LTD., TAKEDA PHARMACEUTICALS NORTH AMERICA, INC., TAKEDA PHARMACEUTICALS LLC, AND TAKEDA PHARMACEUTICALS AMERICA, INC., Plaintiffs, v. ANCHEN PHARMACEUTICALS, INC., AND TWI PHARMACEUTICALS, INC., Defendants.	Case No. 3:11-cv-01609 JCS
TAKEDA PHARMACEUTICAL CO., LTD., TAKEDA PHARMACEUTICALS NORTH AMERICA, INC., TAKEDA PHARMACEUTICALS LLC, AND TAKEDA PHARMACEUTICALS AMERICA, INC., Plaintiffs, v. IMPAX LABORATORIES, INC., Defendant.	Case No. 3:11-cv-01610 JCS

WHEREAS, the Court issued a Case Management and Pretrial Order on August 29, 2011, setting forth the schedule with respect to Claim Construction;

WHEREAS, the Court did not set post-*Markman* dates in its order of August 29, 2011;

WHEREAS, at the Claim Construction Hearing on February 16, 2012, the Court directed the parties to agree on a schedule for the remainder of pre-trial events;

WHEREAS, the parties, by their undersigned attorneys, hereby stipulate to the following schedule, subject to the approval of the Court:

Event	Date
Document Production Complete for Foreign-Language Documents	Monday, 04/30/12*
Document Production Complete for English-Language Documents	Tuesday, 05/15/12*
Fact Discovery Cut-Off	Friday, 07/27/12
Initial Expert Reports on Issues where party Bears Burden of Proof. Takeda will provide any report on secondary considerations at this time.	Friday, 08/24/12
Rebuttal Expert Reports	Friday, 9/21/12
Expert Discovery Cut-Off	Friday, 10/26/12
Last Day to File Dispositive Motions	Tuesday, 11/20/12
Oppositions Due for Dispositive Motions Filed on November 20, 2012	Friday, 12/21/12
Replies Due for Dispositive Motions Filed on November 20, 2012	Friday, 1/10/13
Motions Hearing	Friday, 02/01/13
Pretrial Conference Friday, May 17, 2013 at 1:30 PM	~~Thursday, 03/07/13~~
Trial June 3, 2013 at 8:30 AM	~~March or April 2013~~

* The agreed-upon dates for the close of document production relate to documents produced in response to the comprehensive requests exchanged by the parties last year. The parties acknowledge that additional Requests for Production that are more narrow in scope, such as requests seeking individual documents or small populations of documents, may be issued between now and the close of fact discovery. Furthermore, this agreement is not intended to supersede the requirements of Rule 34 or other Federal Rules of Civil Procedure.

Respectfully Submitted,

DATED: March 21, 2012

TAKEDA PHARMACEUTICAL CO., LTD., TAKEDA PHARMACEUTICALS NORTH AMERICA, INC., TAKEDA PHARMACEUTICALS LLC, AND TAKEDA PHARMACEUTICALS AMERICA, INC.

By: */s/ Heather E. Takahashi*

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ANCHEN PHARMACEUTICALS, INC. AND TWI PHARMACEUTICALS, INC.

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IMPAX LABORATORIES, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: March 26, 2012

UNITED STATES DISTRICT COURT
IT IS SO ORDERED AS MODIFIED
Judge Joseph C. Spero
NORTHERN DISTRICT OF CALIFORNIA

THE HONO[illegible] SPERO
UNITED STA[illegible]GISTRATE JUDGE

Filer's Attestation

I, Heather Takahashi, am the ECF user whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER REGARDING POST-MARKMAN SCHEDULE**. In compliance with General Order 45.X.B, I hereby attest that the other above-named signatory concurs in this filing.

DATED: March 21, 2012

/s/ *Heather E. Takahashi*