IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ELAN PHARMA INTERNATIONAL LIMITED,	)	
Plaintiff,	)	
v.	)	C. A. No. 06-438-GMS
ABRAXIS BIOSCIENCE, INC.,	)	
Defendant.	)	

STIPULATION AND PROPOSED ORDER REGARDING
EXPERT DISCOVERY AND SUMMARY JUDGMENT BRIEFING SCHEDULE

WHEREAS, on July 16, 2007, the Court granted a two week extension of the fact discovery deadline in this matter;

WHEREAS, the parties have agreed, subject to approval by the Court, to the modification of certain other dates set forth in the November 15, 2006 Scheduling Order (D.I. 20) to conform to the extended schedule, allowing for intervening holidays;

WHEREAS neither party intends by the instant Stipulation to waive its rights to seek or obtain any other and further discovery relief, including to make applications for further extensions of discovery deadlines, as circumstances may require; and

WHEREAS, the proposed deadlines set forth herein would not affect the trial schedule set by the Court;

IT IS HEREBY STIPULATED AND AGREED, subject to approval by the Court, that the schedule for expert discovery and summary judgment motions is amended as follows:

Event	**Original Date (per D.I. 20)**	**New Date**
Opening Expert Reports Served [Sched. Order ¶ 5]	September 14, 2007	September 28, 2007

Event	Original Date (per D.I. 20)	New Date
Rebuttal Expert Reports Served [Sched. Order ¶ 5]	October 15, 2007	October 29, 2007
Close of Expert Discovery [Sched. Order ¶ 5]	November 30, 2007	December 14, 2007
Summary Judgment Motions and Opening Briefs [Sched. Order ¶ 8]	December 4, 2007	January 2, 2008
Summary Judgment Answering Briefs [Sched. Order ¶ 8]	December 11, 2007	January 9, 2008
Summary Judgment Reply Briefs [Sched. Order ¶ 8]	December 14, 2007	January 14, 2008
Status Teleconference Regarding Summary Judgment Motions [Sched. Order ¶ 8]	December 20, 2007	January 18, 2008

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SO ORDERED this _____ day of _____, 2007.

_____
CHIEF UNITED STATES DISTRICT JUDGE