

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SANOFI-AVENTIS U.S. LLC,

Plaintiff,

v.

U.S. DEPARTMENT OF HEALTH AND
HUMAN SERVICES, *et al.*,

Defendants.

SO ORDERED.

Dated: 2/8/2021

/s/ Freda L. Wolfson

Hon. Freda L. Wolfson, Chief Judge

No. 3:21-CV-634

**JOINT STIPULATION OF BRIEFING SCHEDULE ON PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

The parties in the above-captioned action have conferred and respectfully request that the Court enter a stipulated schedule changing the hearing and briefing dates for Plaintiff Sanofi-Aventis U.S., LLC's ("Sanofi") pending Motion for Preliminary Injunction ("motion"), *see* ECF No. 19. When Sanofi amended its complaint, *see* ECF No. 17, and filed its motion on February 2, 2021, it noticed the motion for the first available hearing date on this Court's calendar, March 1, 2021. Counsel for Defendants the U.S. Department of Health and Human Services, *et al.*, (collectively "HHS"), contacted counsel for Sanofi, suggesting that, due to the complex issues presented in Sanofi's motion and this suit is one of eight separate suits pending in various jurisdictions, presenting related issues, and handled by undersigned counsel, that additional briefing time is warranted. The parties agreed to request that this Court reschedule hearing on Sanofi's motion to the next available hearing date, and allow a modest amount of additional briefing time for each side. Accordingly, the parties respectfully request that the Court adopt the following schedule:

- Defendants' response to Plaintiff's motion is due **February 25, 2021**

- Plaintiff's reply in support of its motion is due **March 8, 2021**
- Hearing on Plaintiff's motion to be held **March 15, 2021**, or at the Court's soonest availability thereafter.

The parties respectfully suggest that this slight modification to the timeframes set forth in the Court's Local Rules will enable the parties fully to develop and present argument for the Court on the complex constitutional issues raised by Plaintiff's motion.

Dated: February 5, 2021

Respectfully submitted,

s/ Jennifer L. Del Medico

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