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14 *Co-Lead Class Counsel*

15 [Additional counsel listed on signature page]

17 UNITED STATES DISTRICT COURT

18 DISTRICT OF ARIZONA

19 In re:

20 Arizona THERANOS, INC. Litigation,

No. 2:16-cv-2138-DGC

(Consolidated with)
 No. 2:16-cv-2373-HRH
 No. 2:16-cv-2660-HRH
 No. 2:16-cv-2775-DGC
 -and-
 No. 2:16-cv-3599-DGC

**STIPULATION FOR EXTENSION
 OF DATE FOR FILING
 SETTLEMENT PAPERS**

1 Plaintiffs and Defendants Walgreens Boots Alliance, Inc. and Walgreen Arizona
2 Drug Co. (the latter together, “Walgreens”), by and through their undersigned counsel,
3 stipulate as follows:

4 1. On May 22, Plaintiffs and Walgreens filed a Joint Notice of Settlement
5 advising the Court that they had reached an agreement in principle to resolve Plaintiffs’
6 claims against Walgreens on a classwide basis. (Dkt. # 577.)

7 2. On May 24, the Court vacated the litigation schedule in this action and
8 ordered Plaintiffs and Walgreens to file a motion for preliminary approval of the settlement
9 by June 23. (Dkt. # 581.) It also directed Plaintiffs to advise the Court by June 23 regarding
10 the status of settlement talks with Defendants Ramesh Balwani and Elizabeth Holmes. (*Id.*)

11 3. On June 22, 2023, Plaintiffs and Walgreens filed a Stipulation for Extension
12 of Time for Filing Settlement Papers by 14 days, *i.e.*, to July 7, 2023. (Dkt. #582.) Plaintiffs
13 and Walgreens requested this extension, in part, due to Plaintiffs’ ongoing efforts to resolve
14 their claims against Defendants Elizabeth Holmes and Ramesh Balwani, both of whom are
15 currently incarcerated. (*Id.*)

16 4. On June 22, 2023, the Court granted Plaintiffs’ and Walgreens’ extension
17 request, ordering that Plaintiffs and Walgreens file a motion for preliminary approval of
18 their settlement by July 7, 2023. (Dkt. #583.)

19 5. Plaintiffs and Walgreens have been working diligently to prepare the
20 settlement papers.

21 6. Plaintiffs have continued to put significant efforts into resolving their claims
22 against the other Defendants, and have been in communications with counsel for Mr.
23 Balwani and with Ms. Holmes (who is not represented by counsel) via email through the
24 mediator. Due to Mr. Balwani’s and Ms. Holmes’ incarceration, communication with these
25 two defendants has been slower than normal.

26 7. To allow additional time for Plaintiffs and Walgreens to finalize the
27 documentation of their settlement, and for Plaintiffs to continue their efforts regarding Ms.
28 Holmes and Mr. Balwani, the results of which will likely affect the content of class notices

1 and/or other proceedings regarding settlement approval, Plaintiffs and Walgreens
2 respectfully request a second 14-day extension to the existing July 7, 2023 deadline for the
3 submission of preliminary settlement approval papers.

4 8. Plaintiffs and Walgreens therefore stipulate, subject to the Court's approval,
5 to extend the deadline for filing the motion for preliminary approval of the settlement by
6 14 days, *i.e.*, to July 21, 2023.

7 9. Plaintiffs and Walgreens also want to advise to the Court that it is possible
8 they may need further time extensions from the Court, depending on how things proceed
9 with Ms. Holmes and Mr. Balwani and how difficult communications with those two
10 defendants prove.

11
12 The undersigned Parties respectfully submit a concurrently filed [Proposed] Order
13 granting this Stipulation.

14 DATED this 5th day of July, 2023.

15 LEIFF CABRASER HEIMANN &
16 BERNSTEIN LLP.

17 *s/ Roger N. Heller*

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