McCARTER & ENGLISH, LLP	FILED
Four Gateway Center 100 Mulberry Street	JUN 2 4 2009
Newark, New Jersey 07102-0652 (973) 622-4444	Judge Jamie D. Hauter
Attorneys for Defendants AstraZeneca Pharmaceuti AstraZeneca LP, Zeneca Inc., Astra USA, Inc. and H	
CHRIS TATE,	 SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MIDDLESEX COUNTY
Plaintiff,	: : DOCKET NO.: MID-L-1608-07-MT
	: CIVIL ACTION
VS.	 In Re Risperdal/Seroquel/Zyprexa Litigation Case No. 274
ASTRAZENECA PHARMACEUTICALS LP, ASTRAZENECA LP, ASTRA USA, INC., KBI SUB INC., ZENECA, INC., ASTRA USA HOLDINGS CORPORATION, JOHN DOE(S) 1 through 20 and JANE DOE(S) 1 through 20,	CONSENT ORDER
Defendants.	:
	•

THIS MATTER having been presented to the Court at the May 27, 2009 Case

Management Conference, and counsel for the parties having represented to the Court that the parties have met and conferred regarding the choice of law to be applied to the issues to be decided in this action; and the parties having consented hereto; and good cause appearing;

.

IT IS on this 24 day of Jre, 2009, ORDERED:

2. That this Consent Order is entered without prejudice to the parties' rights to take and argue different positions regarding choice of law in other cases pending before this Court, or elsewhere.

3. That notwithstanding the agreement to apply Kentucky law to the state law claims in this action, plaintiffs contend and reserve the right to argue that New Jersey law is to be applied with respect to any motion by defendants seeking dismissal of this action on the grounds that it is time-barred.

4. That this Consent Order may be signed in multiple counterparts, and the separate signature pages executed by the Parties may be combined to create a document binding on all Parties and together shall constitute one and the same instrument.

5. That McCarter and English LLP shall serve a copy of this Order on all Counsel within _____ days of the entry of this Order.

Honorable Jamie D. Happas, J.S.C.

We hereby consent to the form and entry of this Order.

Weitz & Luxenberg P.C. Attorneys for Plaintiff Chris Tate

McCarter & English, LLP

Attorneys for Defendants AstraZeneca Pharmaceuticals LP, AstraZeneca LP, Zeneca Inc., Astra USA, Inc. and KBI Sub Inc.

By: Dated: