IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

MOSKOWITZ FAMILY LLC, Plaintiff, v. MEDTRONIC, INC., MEDTRONIC SOFAMOR DANEK, INC., MEDTRONIC SOFAMOR DANEK USA, INC., WARSAW ORTHOPEDIC, INC., and TITAN SPINE, INC., Defendants.	Case No. 25-cv-00769 PJS/DLM **STIPULATION EXTENDING TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFF'S COMPLAINT**

Plaintiff Moskowitz Family LLC ("Plaintiff") and Defendants Medtronic, Inc.; Medtronic Sofamor Danek, Inc.; Medtronic Sofamor Danek USA, Inc.; Warsaw Orthopedic, Inc.; and Titan Spine, Inc. (collectively, "Medtronic Defendants"), through their undersigned counsel, stipulate and agree that the Medtronic Defendants shall have until June 27, 2025, to answer, move, or otherwise respond to Plaintiff's forthcoming Amended Complaint. The parties agree that good cause exists for this extension because Plaintiff intends to file an Amended Complaint by May 23, 2025, and the stipulated deadline will provide the Medtronic Defendants with sufficient time to review the Amended Complaint before answering, moving, or otherwise responding. The parties request that the Court enter the accompanying proposed order granting the extension.

Dated: May 22, 2025

AVANTECH LAW LLP

s/ Jason M. Zucchi

Jason M. Zucchi (Bar No. 0387908)
William R. Woodford (Bar No.0322593)
Todd S. Werner (Bar No.033019X)
Shelleaha L. Jonas (Bar No. 0398417)
80 South 8th Street, Suite 900
Minneapolis, MN 55402
Phone: (612) 895-2721
zucchi@avantechlaw.com
woodford@avantechlaw.com
werner@avantechlaw.com
jonas@avantechlaw.com

Julianne Thomsen (*pro hac vice* forthcoming)
521 5th Avenue, 17th Floor
New York, NY 10175-0038
Phone: (646) 516-5248
Fax: (612) 464-2001
thomsen@avantechlaw.com

Sabrina Wilson (*pro hac vice*)
730 Peachtree Street NE, Suite 570
Atlanta, GA 30308
Telephone: 404.282.5283
wilson@avantechlaw.com

Attorneys for Plaintiff
Moskowitz Family LLC

Dated: May 22, 2025

s/ X. Kevin Zhao

GREENE ESPEL PLLP

Sybil L. Dunlop, Reg. No. 0390186
X. Kevin Zhao, Reg. No. 0391302
Kshithij Shrinath, Reg. No. 0505164
222 S. Ninth Street, Suite 2200
Minneapolis, MN 55402
sdunlop@greeneespel.com
kzhao@greeneespel.com
kshrinath@greeneespel.com
(612) 373-0830

HUESTON HENNIGAN LLP

Moez M. Kaba (*pro hac vice*)
Christina Von der Ahe Rayburn (*pro hac vice*)
Christine Woodin (*pro hac vice*)
523 West 6th Street, Suite 400
Los Angeles, CA 90014
mkaba@hueston.com
crayburn@hueston.com
cwoodin@hueston.com
(213) 788-4340

Attorneys for Defendants Medtronic, Inc.; Medtronic Sofamor Danek, Inc.; Medtronic Sofamor Danek USA, Inc.; Warsaw Orthopedic, Inc.; and Titan Spine, Inc.