

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

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Dated: May 22, 2025

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