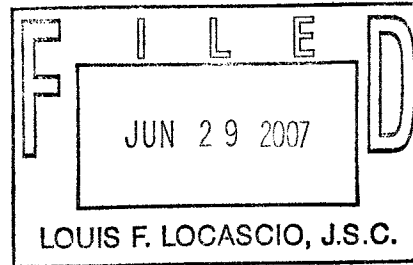


Michael L. Rosenberg, Esq.  
Marshall D. Bilder, Esq.  
Sterns & Weinroth, P.C.  
50 West State Street, Suite 1400  
Post Office Box 1298  
Trenton, NJ 08607-1298  
Telephone: (609) 392-2100  
Facsimile: (609) 392-7956

J. Andrew Jackson, Esq.  
Jodi Trulove, Esq.  
Dickstein Shapiro LLP  
1825 Eye Street, NW  
Washington, DC 20006  
Telephone: (202) 420-2200  
Facsimile: (202) 420-2201



Attorneys for Baxter Healthcare Corporation and  
Baxter International Incorporated and as Liasion Counsel  
on behalf of Corporate Defendants

International Union of Operating  
Engineers, Local No. 68 Welfare Fund,

Plaintiff,

v.

AstraZeneca PLC, et al.,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: MONMOUTH  
COUNTY

CIVIL ACTION NO. MON-L-3136-06

**STIPULATION AUTHORIZING ELECTRONIC SERVICE**

**WHEREAS**, the parties have investigated the electronic services offered by LexisNexis File & Serve; and

**WHEREAS**, the parties have found that the proposal from LexisNexis File & Serve to serve as the e-serve agent in this proceeding would facilitate proper and efficient service; and

**WHEREAS**, each party, through the undersigned counsel, has received information on how to electronically serve documents.

**NOW, THEREFORE**, the parties stipulate to the following:

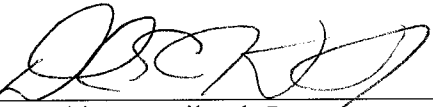
1. As of the date hereof, pursuant to the New Jersey Rules of Court, all attorneys who have appeared on behalf of their respective parties (“counsel of record”) in this case, in lieu of the methods set forth in New Jersey Rules of Court, may use LexisNexis File & Serve to serve any and all pleadings and discovery-related documents requiring service on counsel of record. Each counsel of record may also use LexisNexis File & Serve to serve correspondence.

2. Every pleading, document and instrument served electronically shall bear a facsimile or typographical signature of at least one of the attorneys of record, along with the typed name, address, and telephone number of such attorney. Typographical signatures shall be treated as personal signatures for purposes of electronically served documents under the New Jersey Rules of Court.

3. Each party shall bear its own costs related to use of the Lexis File and Serve system and shall be independently billed.

4. This Stipulation and Order shall apply only to the electronic service of documents upon counsel of record. Counsel or parties filing original documents with the Court shall do so manually with the Clerk of the Court following existing filing procedures pursuant to the New Jersey Rules of Court.

Dated: June 26, 2007

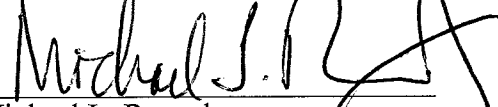
By: 

Donald E. Haviland, Jr.  
The Haviland Law Firm  
Third Floor  
740 South Third Street  
Philadelphia, PA 19147  
Telephone (215) 609-4661  
Facsimile (215) 392-4400

John E. Keefe, Jr.  
Stephen Sullivan  
Keefe Bartels  
830 Broad Street  
Shrewsbury, NJ 07702  
Telephone: (732) 224-9400  
Facsimile: (732) 224-9494

Attorneys for Plaintiff International  
Union of Operating Engineers, Local  
No. 68 Welfare Fund and the Class

Dated: June 27, 2007

By: 

Michael L. Rosenberg  
Marshall D. Bilder  
Sterns & Weinroth, P.C., Suite 1400  
50 West State Street  
Post Office Box 1298  
Trenton, NJ 08607-1298  
Telephone: (609) 392-2100  
Facsimile: (609) 392-7956

J. Andrew Jackson  
Jodi Trulove  
Dickstein Shapiro LLP  
1825 Eye Street, NW  
Washington, DC 20006-5403  
Telephone: (202) 420-2200  
Facsimile: (202) 420-2201

Attorneys for Baxter Healthcare  
Corporation and Baxter International  
Incorporated and as Liaison Counsel on  
behalf of Corporate Defendants

**IT IS SO ORDERED:**

Dated: June 29, 2007



\_\_\_\_\_  
The Honorable Louis F. Locascio, J.S.C.