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*Attorneys for Defendants Sanofi-Aventis US,
Chattem, Inc., and Quten Research Institute, LLC*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

JORDEN HOLLINGSWORTH,

Plaintiff,

v.

SANOFI-AVENTIS US LLC; CHATTEM
INC.; QUTEN RESEARCH INSTITUTE
LLC; AMJ SERVICES LLC; STEVEN S.
DICKERT, in his capacity as Trustee of
BASIL MANAGEMENT TRUST,

Defendants.

Case No.: 3:25-cv-2308-SB

**DECLARATION OF HELEN E.
TUTTLE IN SUPPORT OF
DEFENDANTS SANOFI-AVENTIS US,
CHATTEM, INC., AND QUTEN
RESEARCH INSTITUTE, LLC'S
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT**

I, Helen E. Tuttle, hereby declare as follows:

1. I am a partner with Faegre Drinker Biddle & Reath LLP, co-counsel for Defendants Sanofi-Aventis US (“Sanofi”), Chattem, Inc. (“Chattem”), and Quten Research Institute, LLC (“Quten”) (Sanofi, Chattem, and Quten, collectively, “Defendants”). I make this declaration in support of Defendants’ Unopposed Motion for Extension of Time to Respond to Plaintiff’s Complaint. I am over the age of 18 years old and am competent to testify to the matters stated herein and either have personal knowledge of the facts set forth below or they are from sources deemed reliable.

2. This is Defendants’ first request for an extension of time to answer, move, or otherwise plead or defend as to the Complaint.

3. On January 21, 2026, I emailed Plaintiff Jorden Hollingsworth (“Plaintiff”) to request his consent to an extension of time for Defendants to answer, move, or otherwise plead or defend as to the Complaint. Plaintiff consented to Defendants’ request. Attached hereto as **Exhibit 1** is a true and accurate copy of my email exchange with Plaintiff.

4. Defendants request this extension to allow their attorneys additional time to review and analyze the allegations in the Complaint, review documents, and prepare an appropriate response.

5. Moreover, Defendants also request this extension because they believe that it will be necessary to confer with Plaintiff regarding motion practice.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED this 23rd day of January, 2026.

s/ Helen E. Tuttle
Helen E. Tuttle (*pro hac vice* pending)

DECLARATION OF SERVICE

I hereby certify that on the date set forth below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

I further certify that I caused the foregoing document to be served on the following non-CM/ECF participant by first-class mail and electronic mail (courtesy only):

Jorden Hollingsworth, *plaintiff pro se*
PO Box 16142
Portland, OR 97292

DATED: January 23, 2026.

By: s/ Delores Petrich
Delores Petrich

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