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12 Attorneys for Defendant  
 STRIDE RITE CHILDREN'S GROUP, LLC

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA

17 GALINA SEEBROOK, individually and on  
 18 behalf of all others similarly situated,

19 Plaintiff,

20 v.

21 STRIDE RITE CHILDREN'S GROUP, LLC,  
 22 a Massachusetts limited liability company,

23 Defendant.

Case No. C11-00835-SC

**STIPULATION AND [PROPOSED]  
 ORDER TO STRIKE CERTAIN  
 ALLEGATIONS IN COMPLAINT**

24 After meeting and conferring regarding (i) allegations relating to injunctive relief,  
 25 (ii) allegations relating to "damages," and (iii) the jury demand asserted in the complaint, plaintiff  
 26 Galina Seebrook ("Plaintiff") and defendant Stride Rite Children's Group, LLC ("Stride Rite"),  
 27 by and through their respective counsel, hereby stipulate and agree that the following portions of  
 28 complaint should be stricken:

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- Page 1, line 15 and generally: the words “[JURY TRIAL DEMANDED]” and plaintiff’s demand for trial by jury generally;
- Page 6, line 8: paragraph 24, subparagraph (d), in its entirety;
- Page 6, line 9: paragraph 24, subparagraph (e), in its entirety; and
- Page 7, lines 18-22: second paragraph in the Prayer for Relief in its entirety.

**IT IS SO STIPULATED.**

Dated: April 14, 2011

HOFFMAN & LAZEAR  
H. TIM HOFFMAN (049141)  
ARTHUR W. LAZEAR (083603)  
CHAD A. SAUNDERS (257810)

/s/ Chad A. Saunders  
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Attorneys for Plaintiff  
GALINA SEEBROOK

Dated: April 14, 2011

COOLEY LLP  
MICHELLE C. DOOLIN (179445)  
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Attorneys for Defendant  
STRIDE RITE CHILDREN’S GROUP, LLC

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**[PROPOSED] ORDER**

Having considered the stipulation filed by plaintiff Galina Seebrook (“Plaintiff”) and defendant Stride Rite Children’s Group, LLC, the following portions of the complaint shall be stricken:

- Page 1, line 15 and generally: the words “[JURY TRIAL DEMANDED]” and plaintiff’s demand for trial by jury generally;
- Page 6, line 8: paragraph 24, subparagraph (d), in its entirety;
- Page 6, line 9: paragraph 24, subparagraph (e), in its entirety; and
- Page 7, lines 18-22: second paragraph in the Prayer for Relief in its entirety.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: April 19, 2011



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**FILER'S ATTESTATION**

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all parties have concurred in the filing of this Stipulation and [Proposed] Order to Strike Certain Allegations in Complaint.

Dated: April 14, 2011

COOLEY LLP  
MICHELLE C. DOOLIN (179445)  
LEO P. NORTON (216282)  
DARCIE A. TILLY (239715)

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STRIDE RITE CHILDREN'S GROUP, LLC

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