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9 Attorneys for Defendants
 10 NIKE, INC; NIKE USA, INC. AND
 NIKE RETAIL SERVICES, INC.
 11

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN FRANCISCO DIVISION

16 DUSTIN GORMLEY, individually and on
 behalf of all others similarly situated,
 17
 Plaintiffs,
 18
 v.
 19 NIKE, INC., an Oregon corporation,
 20
 Defendant.

Coordinated Case No. 11-cv-00893-SI

**STIPULATION AND [~~PROPOSED~~] ORDER
 RE EXPERT DISCLOSURES AND REPORTS**

Judge: Hon. Susan Illston
 Place: Courtroom 10, 19th Floor

22 ERIKA MCCARTNEY, on behalf of herself
 and all others similarly situated,
 23
 Plaintiff,
 24
 v.
 25 NIKE, Inc., an Oregon corporation; and
 26 DOES 2 through 20,
 27
 Defendants.

COORDINATED CASE No. 11-cv-00893-SI

1 KRISTEN L. HARTMAN, an individual, on
2 behalf of herself and all others similarly
situated,

3 Plaintiff,

4 v.

5 NIKE USA, INC., an Oregon Corporation;
6 NIKE RETAIL SERVICES, INC., an Oregon
Corporation, and DOES 1 through 50,
7 inclusive,

8 Defendants.

9
10 Plaintiffs Dustin Gormley, Erika McCartney, and Kristen L. Hartman (“plaintiffs”) and
11 defendants Nike, Inc., Nike USA, Inc. and Nike Retail Services, Inc. (“Nike”), by and through
12 their respective counsel, jointly submit the following Stipulation re Class Expert Disclosures and
13 Reports as follows:

14 **RECITAL**

15 **WHEREAS**, via Civil Pretrial Minutes filed August 2, 2011 (ECF No. 33), the Honorable
16 Susan Illston set plaintiffs’ Motion for Class Certification for hearing on May 18, 2012, and set
17 the briefing schedule as follows: Plaintiffs’ Motion for Class Certification due on March 23,
18 2012; Defendants’ opposition brief due on April 20, 2012, and Plaintiffs’ reply brief due on May
19 4, 2012;

20 **STIPULATION**

21 **NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their
22 respective counsel of record, that Nike and plaintiffs will simultaneously disclose experts and
23 produce expert reports (if any) with regard to class certification on the dates designated below:

- 24 1. February 10, 2012: Class Expert Disclosures and Reports for Affirmative
25 Experts;
- 26 2. March 9, 2012: Class Expert Disclosures and Reports for Rebuttal Experts.

1 **IT IS SO STIPULATED.**

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3 Dated: October 21, 2011

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COOLEY LLP
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/s/ Beatriz Mejia
Beatriz Mejia

Attorneys for Defendants
NIKE, INC., NIKE USA, INC., AND NIKE RETAIL
SERVICES, INC.

Dated: October 21, 2011

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ARTHUR W. LAZEAR
CHAD A. SAUNDERS

/s/ Chad A. Saunders
Chad A. Saunders

Attorneys for Plaintiff
DUSTIN GORMLEY

Dated: October 21, 2011

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/s/ Robert B. Hancock
Robert B. Hancock

Attorneys for Plaintiff
ERIKA MCCARTNEY

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Dated: October 21, 2011

FINEMAN & ASSOCIATES
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/s/ Neil B. Fineman
Neil B. Fineman

Attorneys for Plaintiff
ERIKA MCCARTNEY

Dated: October 21, 2011

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/s/ Gene J. Stonebarger
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Attorneys for Plaintiff
KRISTEN L. HARTMAN

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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 re Expert Disclosures and Reports.

Dated: October 21, 2011

COOLEY LLP
MICHELLE C. DOOLIN
BEATRIZ MEJIA
JENNIFER M. FRENCH
MATTHEW M. BROWN

/s/ Matthew M. Brown
Matthew M. Brown

Attorneys for Defendants
NIKE, INC., NIKE USA, INC., and
NIKE RETAIL SERVICES, INC.

IT IS SO ORDERED.

Dated: 10/25/11



The Hon. Susan Illston

1240172 v2/SF

PROOF OF SERVICE
(FRCP 5)

I hereby certify that on October 21, 2011, I electronically filed the:

Stipulation and [Proposed] Order Re Expert Disclosures And Reports

with the clerk using the CM/ECF system, which will send notification of such filing to the following attorneys of record at the following listed email addresses:

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I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelopes with postage thereon fully prepaid to be placed in the United States Postal Service at San Francisco, California, on the following parties in this action:

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Executed on October 21, 2011, at San Francisco, California.



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