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11 *Attorneys for Plaintiff Kristen L. Hartman*

12 *Additional Attorneys Listed on Signature Page*

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

16 DUSTIN GORMLEY, individually and on
 17 behalf of all others similarly situated,

18 Plaintiffs,

19 v.

20 NIKE, INC., an Oregon corporation,

21 Defendant.

Coordinated Case No. 11-cv-00893-SI

22 **JOINT STIPULATION AND [~~PROPOSED~~]
 23 ORDER RE CONSOLIDATION OF ACTION
 24 AND CONSOLIDATED COMPLAINT**

Hon. Susan Illston
Courtroom 10, 19th Floor

25 ERIKA MCCARTNEY, on behalf of herself
 26 and all others similarly situated,

27 Plaintiff,

28 v.

NIKE, Inc., an Oregon corporation; and
 DOES 2 through 20,

Defendants.

Case No. 11-cv-01588-SI

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

Case No. 11-cv-02451 SI

4 Plaintiff,

5 v.

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

10 Defendants.

11 Plaintiffs Dustin Gormley, Erika McCartney, and Kristen L. Hartman (“plaintiffs”) and
12 defendants Nike, Inc., Nike USA, Inc., and Nike Retail Services, Inc., by and through their
13 respective counsel, jointly submit the following Stipulation regarding consolidation of the
14 above-referenced actions for all purposes and the filing of plaintiffs’ consolidated complaint on
15 or before November 11, 2011.

16 **RECITALS**

17 **WHEREAS**, on July 20, 2011, Judge Illston issued an order coordinating the above-
18 captioned related cases (*Gormley v. Nike, Inc.*, Coordinated Case No. 11-cv-00893-SI, ECF No.
19 31); and

20 **WHEREAS**, the parties agree that the above-referenced actions should be consolidated for
21 all purposes because it will promote the interests of judicial economy and efficiency; and

22 **WHEREAS**, the parties agree that plaintiffs should file a consolidated complaint;

23 **STIPULATION**

24 **NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their
25 respective counsel of record, that (1) the above-referenced actions shall be consolidated for all
26 purposes, and (2) that plaintiffs shall file a consolidated complaint on or before November 11,
27 2011.

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///

1 **IT IS SO STIPULATED.**

2 Dated: November 11, 2011

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

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6 */s/Beatriz Mejia*

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

7
8
9 Dated: November 11, 2011

HOFFMAN & LAZEAR
H. TIM HOFFMAN
ARTHUR W. LAZEAR
CHAD A. SAUNDERS

10
11
12 */s/Chad A. Saunders*

Chad A. Saunders

13
14 Attorneys for Plaintiff
DUSTIN GORMLEY

15 Dated: November 11, 2011

PACIFIC JUSTICE CENTER
ROBERT B. HANCOCK
MELVIN B. PEARLSTON

16
17
18 */s/Robert B. Hancock*

Robert B. Hancock

19 Attorneys for Plaintiff
ERIKA MCCARTNEY

20
21 Dated: November 11, 2011

FINEMAN & ASSOCIATES
NEIL B. FINEMAN

22
23 */s/Neil B. Fineman*

Neil B. Fineman

24
25 Attorneys for Plaintiff
ERIKA MCCARTNEY

26
27
28

1 Dated: November 11, 2011

STONEBARGER LAW, APC
GENE J. STONEBARGER
RICHARD D. LAMBERT

2
3
4 /s/ Gene J. Stonebarger
Gene J. Stonebarger

5 Attorneys for Plaintiff
6 KRISTEN L. HARTMAN

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8 **FILER'S ATTESTATION**

9 Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that
10 all parties have concurred in the filing of this Joint Stipulation and [Proposed] Order re
11 Consolidation of Action and Consolidated Complaint.

12
13 Dated: November 11, 2011

STONEBARGER LAW, APC
GENE J. STONEBARGER
RICHARD D. LAMBERT

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15
16 /s/ Gene J. Stonebarger
Gene J. Stonebarger

17 Attorneys for Plaintiff
18 KRISTEN L. HARTMAN

19
20 **IT IS SO ORDERED.**

21
22 Dated: 11/15/11



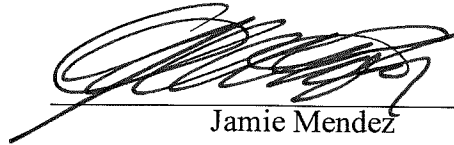
23 The Honorable Susan Illston
United States District Judge

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25 Related Case 11-1588 and 11-2451 shall be administratively
26 closed.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 11, 2011, the foregoing **JOINT STIPULATION AND [PROPOSED] ORDER RE CONSOLIDATION OF ACTION AND CONSOLIDATED COMPLAINT** was filed electronically with the Clerk of the Court to be served by operation of the Court's CM/ECF electronic filing system to all counsel of record.



Jamie Mendez