

1 COOLEY LLP  
 MICHELLE C. DOOLIN (179445) (doolinmc@cooley.com)  
 2 JENNIFER M. FRENCH (265422) (jfrench@cooley.com)  
 4401 Eastgate Mall  
 3 San Diego, CA 92121  
 Telephone: (858) 550-6000  
 4 Facsimile: (858) 550-6420

5 COOLEY LLP  
 BEATRIZ MEJIA (190948) (mejiab@cooley.com)  
 6 MATTHEW M. BROWN (264817) (brownmm@cooley.com)  
 101 California Street, 5th Floor  
 7 San Francisco, CA 94111-5800  
 Telephone: (415) 693-2000  
 8 Facsimile: (415) 693-2222

9 Attorneys for Defendant  
 COLE HAAN

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

15 TAMMIE DAVIS, an individual, on behalf of  
 herself and all others similarly situated,

16 Plaintiff,

17 v.

18 COLE HAAN, INC., a New York  
 19 Corporation; and DOES 1 through 50,  
 inclusive,

20 Defendants.

Case No. 11-cv-01826-JSW

**JOINT STIPULATION AND [~~PROPOSED~~]  
 ORDER RE PLAINTIFFS' CONSOLIDATED  
 COMPLAINT**

Hon. Jeffrey S. White  
 Courtroom

21 STEFANI CONCEPCION, an individual, on  
 22 behalf of herself and all others similarly  
 situated,

23 Plaintiff,

24 v.

25 COLE HAAN, INC., a New York  
 26 Corporation; and DOES 1 through 50,  
 inclusive,

27 Defendants.

Case No. 11-cv-02187-JSW

28 COORDINATED CASE No. 11-cv-02187-JSW

**JOINT STIPULATION AND [~~PROPOSED~~] ORDER RE PLAINTIFFS' CONSOLIDATED COMPLAINT**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Plaintiffs Tammie Davis and Stefani Concepcion (“plaintiffs”) and defendant Cole Haan<sup>1</sup>, by and through their respective counsel, jointly submit the following Stipulation to allow plaintiffs to file a consolidated complaint on or before November 14, 2011.

**RECITALS**

**WHEREAS**, on June 29, 2011, Judge White issued an order coordinating the above-captioned related cases (*Concepcion v. Cole Haan Inc.*, Case No. 11-cv-02187-JSW, ECF No. 19); and

**WHEREAS**, the parties agree that a consolidated complaint will promote the interests of judicial economy and efficiency;

**STIPULATION**

**NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their respective counsel of record, that plaintiffs shall file a consolidated complaint on or before November 14, 2011.

**IT IS SO STIPULATED.**

Dated: October 28, 2011

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

/s/ Beatriz Mejia  
Beatriz Mejia

Attorneys for Defendant  
COLE HAAN

---

<sup>1</sup> Cole Haan was erroneously sued as “Cole Haan, Inc.”

1 Dated: October 28, 2011

HARRISON PATTERSON & O'CONNOR LLP  
JAMES R. PATTERSON

2

3

/s/ James R. Patterson  
James R. Patterson

4

Attorneys for Plaintiff  
TAMMIE DAVIS

5

6

7 Dated: October 28, 2011

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

8

9

/s/ Gene J. Stonebarger  
Gene J. Stonebarger

10

11

Attorneys for Plaintiff  
STEFANI CONCEPCION

12

13

**FILER'S ATTESTATION**

14

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all parties have concurred in the filing of this Stipulation Regarding Deadline to Respond to Complaint.

15

16

17

Dated: October 28, 2011

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

18

19

20

/s/ Matthew M. Brown  
Matthew M. Brown

21

22

Attorneys for Defendant  
COLE HAAN

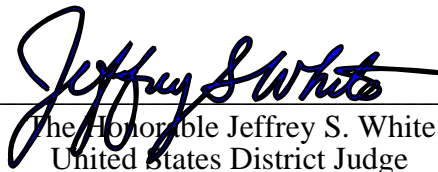
23

The Court DENIES this stipulation without prejudice to refile. In any amended stipulation, the parties shall address whether the cases should be consolidated for all purposes, or some purposes, and who shall be acting as lead counsel.

24

25

Dated: October 31, 2011

  
The Honorable Jeffrey S. White  
United States District Judge

26

27

28