

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.

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.  
 28

Consolidated Case No. 11-cv-01826-JSW

**JOINT STIPULATION AND [PROPOSED]  
 ORDER EXTENDING TIME ON DEADLINES  
 AND DATES RELATED TO PLAINTIFFS'  
 MOTION FOR CLASS CERTIFICATION**

Hon. Jeffrey S. White  
 Courtroom 11, 19<sup>th</sup> Floor

Case No. 11-cv-02187-JSW

1 Pursuant to L.R. 6-2, counsel for Defendant Cole Haan and counsel for Plaintiffs  
2 (collectively, the “Parties”) stipulate as follows:

3 WHEREAS, the deadlines for the class certification motions, fact and expert discovery  
4 cutoffs and motions for summary judgment are as follows:

Deadline/Event	Current Dates (If Any)
Motion for Class Certification is due	April 23, 2012
Opposition to Plaintiffs’ Motion for Class Certification is due	14 days after the date the Motion is filed
Reply in support of the Motion for Class Certification is due	7 days after the Opposition is filed
Hearing on Plaintiffs’ Motion for Class Certification	Not yet scheduled
Close of fact discovery	May 11, 2012
Close of expert discovery	June 11, 2012
The first party’s opening motion for summary judgment is due	June 22, 2012
The second party’s opposition and cross-motion for summary judgment is due	July 6, 2012
The reply and opposition to the cross-motion for summary judgment is due	July 20, 2012
The second party’s reply in support of the cross-motion for summary judgment is due	July 27, 2012
The last day for the Court to hear dispositive motions	August 17, 2012

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

WHEREAS, the parties have been engaged in mediation and post-mediation discussions, and have scheduled a further telephonic conference with Judge Infante, the mediator, for the week of April 9, 2012;

1 WHEREAS, Plaintiff Concepcion is pregnant and due to give birth very soon, which will  
2 limit her availability for deposition before the scheduled close of fact discovery on May 11, 2012;

3 WHEREAS, there have been no previous time modifications, whether by stipulation or  
4 Court Order;

5 WHEREAS, pursuant to such agreement, the Parties hereby seek an Order from the Court  
6 vacating the above-referenced dates, and re-setting the deadlines and dates relating to class  
7 certification, fact and expert discovery, and the motions for summary judgment as specified  
8 below;

9 Now, therefore, the Parties stipulate and respectfully request that the Court order to re-set  
10 the deadlines and dates as follows:

Deadline/Event	Proposed Dates
Motion for Class Certification is due	June 18, 2012
Opposition to Plaintiffs' Motion for Class Certification is due	July 10, 2012
Reply in support of the Motion for Class Certification is due	July 24, 2012
Hearing on Plaintiffs' Motion for Class Certification	August 31, 2012
Close of fact discovery	June 29, 2012
Close of expert discovery	July 30, 2012
The first party's opening motion for summary judgment is due	August 10, 2012
The second party's opposition and cross-motion for summary judgment is due	August 24, 2012
The reply and opposition to the cross-motion for summary judgment is due	September 11, 2012
The second party's reply in support of the	September 18, 2012

1	cross-motion for summary judgment is due	
2	The last day for the Court to hear dispositive	October <del>29</del> <sup>12</sup> , 2012
3	motions	

4

5

6 **IT IS SO STIPULATED.**

7 Dated: April 6, 2012

8 COOLEY LLP  
 9 MICHELLE C. DOOLIN  
 10 JENNIFER M. FRENCH  
 11 BEATRIZ MEJIA  
 12 MATTHEW M. BROWN

13 /s/ Matthew M. Brown

14 \_\_\_\_\_  
 15 Matthew M. Brown  
 16 Attorneys for Defendants  
 17 COLE HAAN

18 Dated: April 6, 2012

19 PATTERSON LAW GROUP, APC  
 20 JAMES R. PATTERSON (211102)

21 /s/ James R. Patterson

22 \_\_\_\_\_  
 23 James R. Patterson

24 Attorneys for Plaintiff  
 25 TAMMIE DAVIS

26 Dated: April 6, 2012

27 STONEBARGER LAW, APC  
 28 GENE J. STONEBARGER (209461)  
 RICHARD D. LAMBERT (251148)

/s/ Gene J. Stonebarger

\_\_\_\_\_

Attorneys for Plaintiff  
 STEFANI CONCEPCION

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

**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 document.

Dated: April 6, 2012

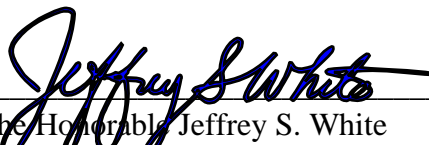
COOLEY LLP

/s/ Matthew M. Brown  
Matthew M. Brown

Attorneys for Defendants  
COLE HAAN

IT IS SO ORDERED/ AS MODIFIED ABOVE.

Dated: April 9, 2012

  
The Honorable Jeffrey S. White  
United States District Judge

1263541/SF