

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

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

8 Attorneys for Defendant  
 9 COLE HAAN

10  
 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 ALL  
 DEADLINES**

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

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, Plaintiffs’ counsel contacted counsel for Cole Haan on May 9, 2012 to  
4 inform Cole Haan of their intention to join a new class action representative to this lawsuit and  
5 requested Cole Haan’s agreement to amend their pleadings to join that new class representative;

6 WHEREAS, Cole Haan has agreed to Plaintiffs’ request to join a new class representative  
7 to this lawsuit;

8 WHEREAS, Plaintiffs will file their First Amended Consolidated Complaint joining a  
9 new class representative on or before June 8, 2012;

10 WHEREAS, the Parties will need approximately an additional 60 days to complete  
11 discovery with respect to Plaintiffs’ proposed new class representative;

12 WHEREAS, the Parties agree to continue the deadlines relating to dispositive motions  
13 until after the Court has heard Plaintiffs’ Motion for Class Certification;

14 WHEREAS, the Parties are in the process of scheduling (among others) the new class  
15 representative’s deposition and Defendant's 30(b)(6) deposition(s);

16 WHEREAS, the deadlines for the class certification motions, fact and expert discovery  
17 cutoffs, motions for summary judgment, and the pretrial conference and trial dates are as  
18 specified in the table below;

19 WHEREAS, there has been only one time modification to the below schedule by  
20 stipulation on April 9, 2012 [ECF 51];

21 WHEREAS, pursuant to such agreement, the Parties hereby seek an Order from the Court  
22 vacating the below-referenced dates, and rescheduling the deadlines and dates relating to class  
23 certification, fact and expert discovery, motions for summary judgment, and the pretrial  
24 conference and trial dates as specified below;

25 Now, therefore, the Parties stipulate and respectfully request that the Court order that the  
26 current deadlines and dates be rescheduled as specified in the table below:

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	<b>Deadline/Event</b>	<b>Current Dates</b>	<b>Proposed Dates</b>
1			
2			
3	First Amended Consolidated	Not Applicable	June 8, 2012
4	Complaint is due		
5	Answer to Plaintiffs' First	Not Applicable	Consistent with Rules
6	Amended Consolidated		
7	Complaint is due		
8	Motion for Class Certification is	June 18, 2012	August 27, 2012
9	due		
10	Opposition to Plaintiffs' Motion	July 10, 2012	September 21, 2012
11	for Class Certification is due		
12	Reply in support of the Motion	July 24, 2012	October 5, 2012
13	for Class Certification is due		
14	Hearing on Plaintiffs' Motion for	August 31, 2012	November <sup>9</sup> <del>2</del> , 2012
15	Class Certification		
16	Close of fact discovery	June 29, 2012	October 12, 2012
17	Close of expert discovery	July 30, 2012	December 14, 2012
18	The first party's opening motion	August 10, 2012	January 18, 2013
19	for summary judgment is due		
20	The second party's opposition	August 24, 2012	February 1, 2013
21	and cross-motion for summary		
22	judgment is due		
23	The reply and opposition to the	September 11, 2012	February 19, 2013
24	cross-motion for summary		
25	judgment is due		
26	The second party's reply in	September 18, 2012	February 26, 2013
27	support of the cross-motion for		
28			

Deadline/Event	Current Dates	Proposed Dates
summary judgment is due		
The last day for the Court to hear dispositive motions	October 12, 2012	March 22, 2013
Pretrial Conference	December 10, 2012	<del>June 17</del> <del>April 15,</del> 2013
Trial	January 22, 2013	<del>July 8</del> <del>May 20,</del> 2013

**IT IS SO STIPULATED.**

Dated: June 1, 2012

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

/s/ Matthew M. Brown

Matthew M. Brown  
Attorneys for Defendants  
COLE HAAN

Dated: June 1, 2012

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

/s/ James R. Patterson

James R. Patterson

Attorneys for Plaintiff  
TAMMIE DAVIS

Dated: June 1, 2012

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

/s/ Gene J. Stonebarger

Gene J. Stonebarger

Attorneys for Plaintiff  
STEFANI CONCEPCION

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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 document.

Dated: June 1, 2012

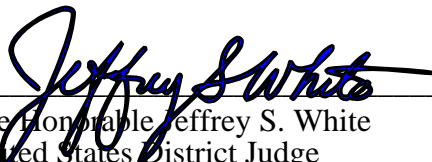
COOLEY LLP

/s/ Matthew M. Brown  
Matthew M. Brown

Attorneys for Defendants  
COLE HAAN

**IT IS SO ORDERED,** AS MODIFIED ABOVE

Dated: June 4, 2012

  
The Honorable Jeffrey S. White  
United States District Judge

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