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6 *Attorneys for Plaintiff Nelson and the Class*

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14 *Attorneys for Defendant*

15 *Additional Counsel Listed on Signature Page*

17 UNITED STATES DISTRICT COURT  
 18 NORTHERN DISTRICT OF CALIFORNIA  
 19 SAN FRANCISCO DIVISION

21 KIMBERLY MAIN, an individual, on behalf  
 of herself and all others similarly situated,

22 Plaintiff,

23 v.

24 WAL-MART STORES, INC., and DOES 1  
 25 through 50, inclusive,

26 Defendants.

Case No. C 11-01919 JSW

**JOINT STIPULATION AND [PROPOSED]  
 ORDER RE CONSOLIDATION OF ACTIONS  
 AND CONSOLIDATED COMPLAINT**

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

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ROBIN NELSON, an individual, on behalf of  
herself and all others similarly situated,  
  
Plaintiff,  
  
v.  
  
WAL-MART STORES, INC., and DOES 1  
through 50, inclusive,  
  
Defendants.

Case No. C 11-02001 JSW

MARYLYNN GRIKAVICIUS, an individual,  
on behalf of herself and all others similarly  
situated,  
  
Plaintiff,  
  
v.  
  
WAL-MART STORES, INC., and DOES 1  
through 50, inclusive,  
  
Defendants.

Case No. C 11-02893 JSW

LOURDES R. LANDEROS, an individual, on  
behalf of herself and all others similarly  
situated,  
  
Plaintiff,  
  
v.  
  
WAL-MART STORES, INC., and DOES 1  
through 50, inclusive,  
  
Defendants.

Case No. C 11-02659 JSW

TINA BAUER, an individual, on behalf of  
herself and all others similarly situated,  
  
Plaintiff,  
  
v.  
  
WAL-MART STORES, INC., and DOES 1  
through 50, inclusive,  
  
Defendants.

Case No. C 11-03233 JSW

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1 Plaintiffs Kimberly Main, Robin Nelson, Marylynn Grikavicius, Lourdes R. Landeros,  
2 and Tina Bauer ("Plaintiffs") and defendant Wal-Mart Stores, Inc., by and through their  
3 respective counsel, jointly submit the following Stipulation regarding consolidation of the above-  
4 referenced actions for all purposes and the filing of Plaintiffs' consolidated complaint on or  
5 before December 9, 2011.

6 **RECITALS**

7 **WHEREAS**, this Court has issued Orders relating each of the above-captioned cases (*Main*  
8 *v. Wal-Mart Stores, Inc.*, Case No. C 11-01919; ECF Doc. Nos. 14, 17, 28, 29);

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

11 **WHEREAS**, the parties agree that Plaintiffs should file a consolidated complaint; and

12 **WHEREAS**, Plaintiffs agree that Stonebarger Law, APC, and Westrup Klick LLP, shall  
13 serve as Co-Lead Plaintiffs' Counsel once the above-referenced actions are consolidated.

14 **STIPULATION**

15 **NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their  
16 respective counsel of record, that (1) the above-referenced actions shall be consolidated for all  
17 purposes, (2) Plaintiffs shall file a consolidated complaint on or before December 9, 2011, (3)  
18 Stonebarger Law, APC, and Westrup Klick LLP, shall serve as Co-Lead Plaintiffs' Counsel once  
19 the above-referenced actions are consolidated, whereby Co-Lead Plaintiffs' Counsel will be  
20 responsible for directing work to be performed by Plaintiffs' counsel on behalf of the putative  
21 class, for the preparation of any documents to be filed with the Court, and for communications  
22 with the Court and Defense Counsel, and (4) this stipulation shall not alter the time within which  
23 the parties shall make their initial disclosures or respond to discovery requests that were  
24 propounded prior to entry of the order made pursuant to this stipulation.

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**IT IS SO STIPULATED.**

Dated: November 16, 2011

REED SMITH LLP

/s/Abraham J. Colman  
Abraham J. Colman  
Scott H. Jacobs  
Brandon W. Corbridge

Attorneys for Defendant  
WAL-MART STORES, INC.

Dated: November 16, 2011

PATTERSON LAW GROUP, APC

/s/James R. Patterson  
James R. Patterson  
Matthew J. O'Connor  
402 West Broadway, 29<sup>th</sup> Floor  
San Diego, CA 92101

Attorneys for Plaintiff Kimberly Main

Dated: November 16, 2011

STONEBARGER LAW, APC

/s/Gene J. Stonebarger  
Gene J. Stonebarger  
Richard D. Lambert  
75 Iron Point Circle, Suite 145  
Folsom, CA 95630

Attorneys for Plaintiff Robin Nelson

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Dated: November 16, 2011

WESTRUP KLICK LLP

/s/Mark L. VanBuskirk

Mark L. VanBuskirk  
R. Duane Westrup  
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Long Beach, CA 90802-4524

Attorneys for Plaintiff Grikavicius

Dated: November 16, 2011

HOFFMAN & LAZEAR

/s/Chad A. Saunders

Chad A. Saunders  
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Oakland, CA 94612

Attorney for Plaintiff Lourdes R. Landeros

Dated: November 16, 2011

MORRIS and ASSOCIATES

/s/Stephen B. Morris

Stephen B. Morris  
444 West C Street, Suite 300  
San Diego, CA 92101

Attorney for Plaintiff Tina Bauer

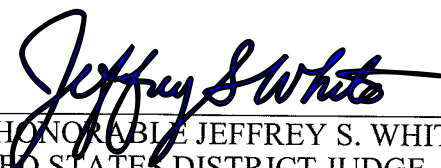
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~~PROPOSED~~ ORDER

Based on the foregoing, and good cause appearing, **IT IS HEREBY ORDERED** that:  
as case no. 11-01919 JSW  
(1) the above-referenced actions shall be consolidated for all purposes, (2) Plaintiffs shall file a  
^  
consolidated complaint on or before December 9, 2011, (3) Stonebarger Law, APC, and Westrup  
Klick LLP, shall serve as Co-Lead Plaintiffs' Counsel in the above-referenced consolidated  
actions, and shall be responsible for directing work to be performed by Plaintiffs' counsel on  
behalf of the putative class, for the preparation of any documents to be filed with the Court, and  
for communications with the Court and Defense Counsel, and (4) this stipulation shall not alter  
the time within which the parties shall make their initial disclosures or respond to discovery  
requests that were propounded prior to entry of this order.

**IT IS SO ORDERED.**

Dated: November 28, 2011

  
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THE HONORABLE JEFFREY S. WHITE  
UNITED STATES DISTRICT JUDGE