

SCOTT COLE & ASSOCIATES, APC
ATTORNEY'S AT LAW
THE WACHOVIA TOWER
1970 BROADWAY, NINTH FLOOR
OAKLAND, CA 94612
TEL: (510) 891-9800

1 Scott Edward Cole, Esq. (S.B. # 160744)
2 Hannah R. Salassi, Esq. (S.B. # 230117)
3 **SCOTT COLE & ASSOCIATES, APC**
4 1970 Broadway, Ninth Floor
5 Oakland, California 94612
6 Telephone: (510) 891-9800
7 Facsimile: (510) 891-7030
8 Email: scole@scalaw.com
9 Email: hsalassi@scalaw.com
10 Web: www.scalaw.com

11 Attorneys for Representative Plaintiff
12 and the Plaintiff Class

13 **AKIN GUMP STRAUSS HAUER & FELD LLP**
14 CAHTERINE A. CONWAY (SBN 98366)
15 GREGORY W. KNOPP (SBN 237615)
16 GARY M. MCLAUGHLIN (SBN 217832)
17 cconway@akingump.com
18 gknopp@akingump.com
19 gmmclaughlin@akingump.com
20 2029 Century Park East, Suite 2400
21 Los Angeles, California 90067-3012
22 Telephone: 310-229-1000
23 Facsimile: 310-229-1001

24 Attorneys for Defendant
25 Michaels Stores, Inc.

26 **UNITED STATES DISTRICT COURT**
27 **NOTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

28 ANITA C. RAGANO, TERI
MCDONALD, individually, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

MICHAELS STORES, INC.,
and DOES 1 through 100, inclusive,

Defendants.

) **Case No. CV 11-3908 LB**
)
) **CLASS ACTION**

) **ORDER GRANTING LEAVE TO FILE**
) **SECOND AMENDED COMPLAINT**

SCOTT COLE & ASSOCIATES, APC
ATTORNEY'S AT LAW
THE WACHOVIA TOWER
1970 BROADWAY, NINTH FLOOR
OAKLAND, CA 94612
TEL: (510) 881-9800

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

Representative Plaintiffs Anita Ragano and Teri McDonald (“Plaintiffs”), individually, and on behalf of all others similarly situated, and defendant Michaels Stores, Inc. (“Defendant”), by and through their respective counsel of record, hereby agree and stipulate as follows:

IT IS STIPULATED AND AGREED, by and between the parties through their respective attorneys of record and subject to the approval of the Court, to permit the filing of Plaintiffs’ Second Amended Complaint to allege a claim under the Private Attorneys General Act.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties through their respective attorneys of record and subject to the approval of the Court, that the proposed Second Amended Complaint in the form attached hereto as Exhibit “A” shall be deemed filed upon this Court’s entry of the [Proposed] Order attached hereto.

IT IS SO STIPULATED.

Dated: November ____, 2011

SCOTT COLE & ASSOCIATES, APC

By: /s/ Hannah R. Salassi
Hannah R. Salassi, Esq.
Attorneys for the Representative Plaintiffs
and the Plaintiff Class

Dated: November ____, 2011

AKIN GUMP STRAUSS HAUER & FELD LLP

By: /s/ Gary McLaughlin
Gary McLaughlin, Esq.
Attorneys for Defendant Michaels Stores, Inc.

SCOTT COLE & ASSOCIATES, APC
ATTORNEY'S AT LAW
THE WACHOVIA TOWER
1970 BROADWAY, NINTH FLOOR
OAKLAND, CA 94612
TEL: (510) 891-9800

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

ORDER

**UPON GOOD CAUSE APPEARING, AND PURSUANT TO THE STIPULATION
BETWEEN PARTIES, THE COURT HEREBY ORDERS AS FOLLOWS:**

Leave is hereby Granted for Plaintiffs to file their Second Amended Complaint upon entry of this order.

IT IS SO ORDERED.

Dated: December 2, 2011

Honorable Charles Breyer
United States District Court

