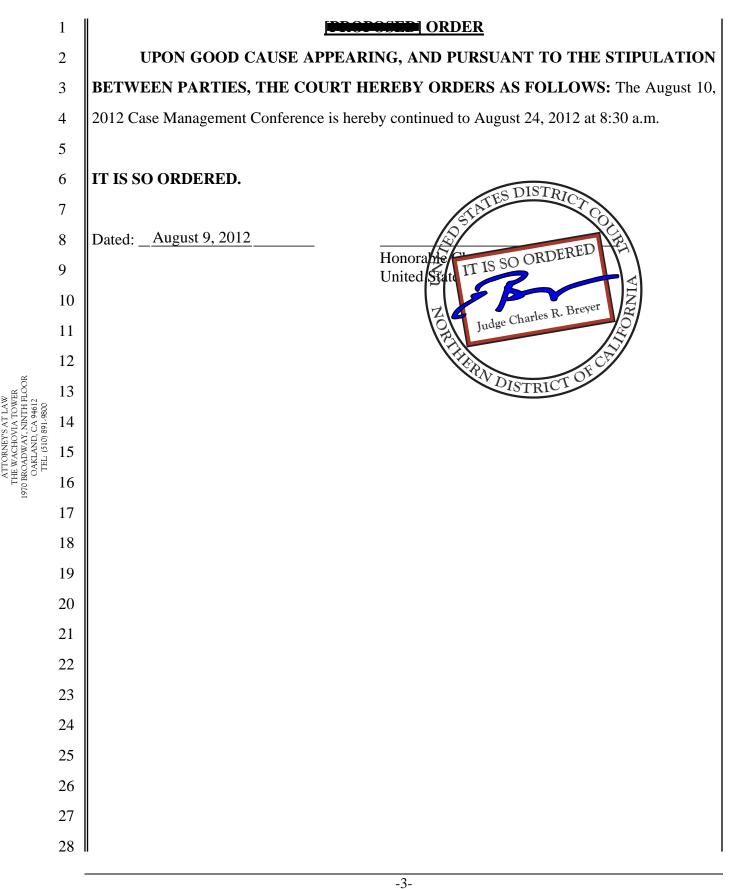
SCOTT COLE & ASSOCIATES, APC ATTORNEYS AT LAW THE WACHOVIA TOWER 1970 BROADWAY, NINTH FLOOR OAKLAND, CA 94612 TEL (510) 891-9800	1 2 3 4 5 6 7	Scott Edward Cole, Esq. (S.B. # 160744) Hannah R. Salassi, Esq. (S.B. # 230117) SCOTT COLE & ASSOCIATES, APC 1970 Broadway, Ninth Floor Oakland, California 94612 Telephone: (510) 891-9800 Facsimile: (510) 891-7030 Email: scole@scalaw.com Email: hsalassi@scalaw.com Web: www.scalaw.com Web: www.scalaw.com	
	 8 9 10 11 12 13 	AKIN GUMP STRAUSS HAUER & FELD LLP GREGORY W. KNOPP (SBN 237615) GARY M. MCLAUGHLIN (SBN 217832) cconway@akingump.com gknopp@akingump.com 2029 Century Park East, Suite 2400 Los Angeles, California 90067-3012 Telephone: 310-229-1000 Facsimile: 310-229-1001	
	14 15	Attorneys for Defendant Michaels Stores, Inc.	
	16	UNITED STATES DISTRICT COURT	
	17	NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION	
	18		
	19 20	ANITA C. RAGANO, TERI	Case No. CV 11-3908 CRB
	20 21	MCDONALD, individually, and on behalf of all others similarly situated,	CLASS ACTION
	21	Plaintiffs,	JOINT STIPULATION AND [DROPOGED
	22	vs.	ORDER] TO CONTINUE FURTHER CASE MANAGEMENT CONFERENCE
	23	MICHAELS STORES, INC.,) and DOES 1 through 100, inclusive,)	
	25	Defendants.	
	26))	
	27		
	28		

-1-JOINT STIPULATION AND [PROPOSED ORDER] TO CONTINUE FURTHER CASE MANAGEMENT CONFERENCE

1	Representative Plainti	ffs Anita Ragano and Teri McDonald ("Plaintiffs"),		
2	individually, and on behalf of all others similarly situated, and defendant Michaels Stores, Inc.			
3	("Defendant"), by and through their respective counsel of record, hereby stipulate and request that			
4	the Court continue the case management conference scheduled for August 10, 2012 to August 24,			
5	2012.			
6	The parties' Request is made on the following grounds:			
7	1. On August 7, 2012, the parties conducted a mediation and have entered into			
8	settlement negotiations.			
9	2. The parties are currently still in negotiations regarding the terms and conditions of a			
10	potential settlement, and would like to update the Court with the outcome of those negotiations,			
11	which may not be complete in advance of the current case management conference date.			
12	3. Accordingly the parties respectfully request that the Court enter the Order jointly			
13	proposed by the parties.			
14				
15	IT IS SO STIPULATED.			
16	Dated: August 9, 2012	SCOTT COLE & ASSOCIATES, APC		
17	T T	By: <u>/s/ Hannah R. Salassi</u>		
18		Hannah R. Salassi, Esq. Attorneys for the Representative Plaintiffs		
19		and the Plaintiff Class		
20				
21	Dated: August 9, 2012	AKIN GUMP STRAUSS HAUER & FELD LLP		
22				
23	L L L L L L L L L L L L L L L L L L L	By: <u>/s/ Gary McLaughlin</u> Gary McLaughlin, Esq.		
24		Attorneys for Defendant Michaels Stores, Inc.		
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26				
27				

SCOTT COLE & ASSOCIATES, APC ATTCNRPYS AT LAW THE WACHOVIA TOWER 1970 BROADWAY, ININTH FLOOR OAKLAND, CA 94612 TEL. (510) 891-9800



SCOTT COLE & ASSOCIATES, APC