

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

1 Representative Plaintiffs 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.

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15 **IT IS SO STIPULATED.**

16 Dated: August 9, 2012

SCOTT COLE & ASSOCIATES, APC

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

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21 Dated: August 9, 2012

AKIN GUMP STRAUSS HAUER & FELD LLP

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

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~~PROPOSED~~ ORDER

UPON GOOD CAUSE APPEARING, AND PURSUANT TO THE STIPULATION
BETWEEN PARTIES, THE COURT HEREBY ORDERS AS FOLLOWS: The August 10,
2012 Case Management Conference is hereby continued to August 24, 2012 at 8:30 a.m.

IT IS SO ORDERED.

Dated: August 9, 2012

Honorable C
United States

