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 6 AYANNA NOBLES, on behalf of herself
 and others similarly situated

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Attorneys for Defendants
 L'ORÉAL USA, INC. and
 MAYBELLINE, LLC

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

20 AYANNA NOBLES, on behalf of herself
 and others similarly situated,

21 Plaintiffs,

22 v.

23 L'ORÉAL USA, INC., a Delaware
 24 corporation; MAYBELLINE, LLC, a New
 York limited liability company dba
 MAYBELLINE, NEW YORK,

25 Defendants.

Case No. 3:13-cv-01911-CRB
 Hon. Charles R. Breyer

JOINT STIPULATION TO AMEND AND
 TRANSFER, AND ORDER

1 WHEREAS, Plaintiff Ayanna Nobles and Defendants L'Oréal USA, Inc. and Maybelline,
2 LLC, a New York limited liability company d/b/a Maybelline, New York (collectively
3 "Defendants") are presently named parties in the above captioned litigation; and

4 WHEREAS, on August 22, 2013, the Court ordered the parties to show cause why this action
5 and the related action *Orshansky v. L'Oréal USA, Inc., et al.*, Case No. 3:12-cv-06342, should or
6 should not be transferred to the United States District Court for the Southern District of New York;

7 Now, therefore, Plaintiff Ayanna Nobles and Defendants, by and through their respective
8 counsel of record, hereby stipulate as follows:

9 1. By September 16, 2013, Plaintiff and counsel for Liat Orshansky, plaintiff in the related
10 action *Orshansky v. L'Oréal USA, Inc., et al.*, Case No. 3:12-cv-06342, will file an amended
11 complaint in this action, adding Ms. Orshansky as a plaintiff and omitting the currently-pleaded
12 claims respecting the mascara products, Maybelline's Volum'Express The Falsies and L'Oréal Paris'
13 Voluminous False Fiber Lashes, thus pleading claims only with respect to SuperStay 14HR Lipstick
14 and SuperStay 10 Stain Gloss. Following that amendment, pursuant to 28 U.S.C. s. 1404(a), all
15 parties consent to the transfer of this action to the United States District Court for the Southern
16 District of New York, where an earlier-filed matter pertaining to the same products, *Leebove v.*
17 *Maybelline, LLC*, No. 1:12-cv-07146 (S.D.N.Y.), is pending, and to which this action should be
18 considered related upon transfer to the Southern District of New York. Plaintiff agrees that she will
19 not oppose the consolidation of this action with the *Leebove* action once this action is transferred.

20 2. By September 16, 2013, Plaintiff and counsel for Liat Orshansky, shall file an amended
21 complaint in *Orshansky v. L'Oréal USA, Inc., et al.*, Case No. 3:12-cv-06342, adding Ms. Nobles as
22 a plaintiff and omitting the currently-pleaded claims respecting Maybelline's SuperStay 14HR
23 Lipstick and SuperStay 10 Stain Gloss, and thus pleading claims only with respect to the mascara
24 products described above. Defendants do not object to *Orshansky v. L'Oréal USA, Inc., et al.*, Case
25 No. 3:12-cv-06342, as so amended, remaining venued in this District before this Court subject to the
26 Court's discretion pursuant to 28 U.S.C. section 1404(a).

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IT IS SO STIPULATED.

DATED: September 9, 2013.

THE TERRELL LAW GROUP

By: /s/ Reginald Von Terrell
Reginald Von Terrell

Attorneys for Plaintiff LIAT ORSHANSKY

FARELLA BRAUN & MARTEL LLP

By: /s/ C. Brandon Wisoff
C. Brandon Wisoff

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By: /s/ Jeffrey S. Jacobson
Jeffrey S. Jacobson

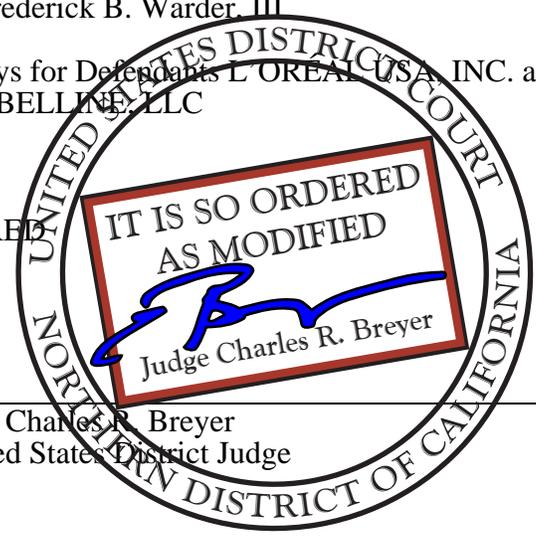
PATTERSON BELKNAP WEBB & TYLER LLP

By: /s/ Frederick B. Warder, III
Frederick B. Warder, III

Attorneys for Defendants L'OREAL USA, INC. and
MAYBELLINE, LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: 9/10/2013



Hon. Charles R. Breyer
United States District Judge