1 LAW OFFICES OF TODD M. FRIEDMAN 2 Todd M. Friedman, Bar No. 216752 tfriedman@attorneysforconsumers.com 3 324 South Beverly Drive, #725 Beverly Hills, CA 90212 4 +1.877.206.4741 Tel: +1.866.633.0228 Fax: 5 Attorneys for Plaintiff 6 LAURIE MUNNING 7 MORGAN, LEWIS & BOCKIUS LLP Joseph Duffy, Bar No. 241854 8 joseph.duffy@morganlewis.com Esther K. Ro, Bar No. 252203 esther.ro@morganlewis.com 10 300 South Grand Avenue Twenty-Second Floor 11 Los Angeles, CA 90071-3132 Tel: +1.213.612.2500 12 Fax: +1.213.612.2501 13 Attorneys for Defendants THE GAP, INC., GAP (APPAREL) LLC, GAP 14 INTERNATIONAL SALES, INC., BANANA REPUBLIC LLC, and BANANA REPUBLIC 15 (APPAREL) LLC 16 17 UNITED STATES DISTRICT COURT 18 NORTHERN DISTRICT OF CALIFORNIA 19 20 LAURIE MUNNING, on behalf of herself and Case No. 3:16-cv-03804-TEH all others similarly situated, 21 STIPULATION ALLOWING Plaintiff, 22 PLAINTIFF MORE TIME TO FILE AN AMENDED COMPLAINT AND VS. 23 **DEFENDANTS ADDITIONAL TIME TO** THE GAP, INC., GAP (APPAREL) LLC, RESPOND 24 GAP INTERNATIONAL SALES, INC., BANANA REPUBLIC LLC, and BANANA 25 REPUBLIC (APPAREL) LLC, 26 Defendants. 27 28



Stipulation Allowing Plaintiff More Time to File an Amended Complaint and Defendants More Time to Respond DB2/ 30784627.1

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COME NOW, Plaintiff Laurie Munning and Defendants The Gap, Inc., Gap (Apparel) LLC., Gap International Sales, Inc., Banana Republic LLC., and Banana Republic (Apparel) LLC. (collectively referred to herein as "Defendants" or "Gap"), by and through respective counsel, hereby stipulate to permit Plaintiff to file her First Amended Complaint on or before December 12, 2016 and for Defendant Gap to respond to the First Amended Complaint on or before January 9, 2017.

GOOD CAUSE exists for permitting Plaintiff to have until December 12, 2016 to file her First Amended Complaint. Plaintiff intends to reserve her CLRA notice on the Defendants in the near future. Instead of Plaintiff filing her First Amended Complaint on November 18, 2016 then moving to then again amend her pleadings in 30 days once the CLRA notice period expires, the parties deemed it more efficient to permit Plaintiff to file her First Amended Complaint on or before December 12, 2016 to avoid unnecessary motion practice as well as an extra set of pleadings.

WHEREBY, Plaintiff Laurie Munning and Defendant Gap by and through their respective counsel hereby stipulate that Plaintiff's First Amended Complaint shall be filed on or before December 12, 2016 and further stipulate that Defendant Gap's response to the First Amended Complaint shall be filed on or before January 9, 2017.

SO STIPULATED

1 2	Dated: November 8, 2016	LAW OFFICES OF TODD M. FRIEDMAN
3		
4		By <u>/s/ Todd M. Friedman</u> Todd M. Friedman
5		
6		And
7		
8		PARIS ACKERMAN & SCHMIERER LLP Ross H. Schmierer, Esq. (admitted pro hac vice)
9		Tross II. Semmerer, 25q. (wammen pro nac vice)
10		and
11		
12		DeNITTIS OSEFCHEN, P.C. Stephen P. DeNittis, Esq. (admitted pro hac vice)
13		Attorneys for Plaintiff LAURIE MUNNING
15		
16	Dated: November 8, 2016	MORGAN, LEWIS & BOCKIUS LLP
17		
18		By <u>/s/Joseph Duffy</u>
19		Joseph Duffy Esther K. Ro
20		Attorneys for Defendants THE GAP, INC., GAP (APPAREL) LLC, GAP
21		INTERNATIONAL SALES, INC., BANANA REPUBLIC LLC, and BANANA REPUBLIC (APPAREL) LLC
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1 **ATTESTATION** 2 I, Stephen P. DeNittis, am the registered ECF user whose username and password are 3 being used to file this Stipulation. In compliance with LR 5-1(i)(3), I hereby attest that the 4 above-identified counsel concurred in this filing. 5 6 Dated: November 8, 2016 7 By <u>/s/ Stephen P. DeNittis</u> 8 9 10 Filed electronically on this 8th day of November, 2016, with: 11 United States District Court CM/ECF system 12 13 Notification sent electronically on this 8th day of November, 2016, to: 14 15 Honorable Thelton E. Henderson **United States District Court** 16 Northern District of California 17 18 Joseph Duffy, Esq. MORGAN, LEWIS & BOCKIUS LLP 19 300 S. Grand Avenue, Twenty-Second Floor Los Angeles, CA 90071-3132 20 21 Attorney for Defendants 22 s/Stephen P. DeNittis 23 Stephen P. DeNittis 24 25 26 27 28 Stipulation Allowing Plaintiff More Time to File an Amended Complaint and Defendants More Time to Respond

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