1 2 3 4 5 6	COOLEY LLP MICHELLE C. DOOLIN (179445) (doolinmc@ MAZDA K. ANTIA (214963) (mantia@cooley. JENNIFER M. FRENCH (265422) (jfrench@co 4401 Eastgate Mall San Diego, CA 92121 Telephone: (858) 550-6000 Facsimile: (858) 550-6420 Attorneys for Defendant THE CHILDREN'S PLACE RETAIL STORES	.com) poley.com)
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8 9	UNITED STATES DISTRICT COURT	
9 10	NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION	
10	UARLAN	
12	GALINA SEEBROOK, individually and on	Case No. 11-cv-00837-CW
13	behalf of all others similarly situated,	STIPULATION AND ORDER RELATING
14	Plaintiffs,	CASES
15	V.	
16	THE CHILDREN'S PLACE RETAIL STORES, INC., a Delaware corporation,	
17	Defendant.	
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COOLEY LLP Attorneys At Law San Diego	S τίριι ατίον ανό [Ρεορος	Case No. 11-cv-00837-CW

1	Pursuant to Local Civil Rules 3-12, 7-11, and 7-12, counsel for plaintiff Galina Seebrook	
2	in Seebrook v. The Children's Place Retail Stores, Inc., Case No. 11-cv-00837-CW	
3	("Seebrook"), counsel for plaintiff Maria Isabel Beltran in The Children's Place Retail Stores,	
4	Inc., et al., Case No. 11-cv-01664-CW ("Beltran"), counsel for plaintiff Nicole DiSimone in	
5	DiSimone v. The Children's Place Retail Stores, Inc., et al., Case No. 11-cv-02223-SC	
6	("DiSimone"), counsel for plaintiff Kristen Hartman in Hartman v. The Children's Place Retail	
7	Stores, Inc., et al., Case No. 11-cv-02604-JSC, and counsel for defendant The Children's Place	
8	Retail Stores, Inc. ("Children's Place") jointly submit the following Stipulation that the four	
9	cases are related.	
10	RECITALS	
11	WHEREAS, on February 17, 2011, plaintiff Nicole DiSimone filed the above-referenced	
12	putative class action lawsuit against defendant Children's Place in the Superior Court of the State	
13	of California, County of Los Angeles;	
14	WHEREAS, on February 23, 2011, plaintiff Galina Seebrook filed this putative class	
15	action lawsuit against defendant Children's Place in this Court;	
16	WHEREAS, on March 9, 2011, plaintiff Maria Isabel Beltran filed the above-referenced	
17	putative class action lawsuit against defendant Children's Place in the Superior Court for the State	
18	of California, County of San Francisco;	
19	WHEREAS, on March 28, 2011, Children's Place removed the DiSimone case to the	
20	United States District Court for the Central District of California;	
21	WHEREAS, on April 6, 2011, Children's Place removed the Beltran action to the United	
22	States District Court for the Northern District of California;	
23	WHEREAS, on April 18, 2011, the Honorable Claudia Wilken issued an order relating the	
24	Seebrook and Beltran cases and reassigning the Beltran case to her docket;	
25	WHEREAS, on May 2, 2011, the Honorable A. Howard Matz ordered that the DiSimone	
26	action be transferred to the Northern District of California;	
27	///	
28	/// CASE NO. 11-CV-00837-CW	
	1. CASE NO. 11-CV-00837-CW	

COOLEY LLP Attorneys At Law San Diego

1	WHEREAS, Children's Place and plaintiffs Seebrook, Beltran, and DiSimone previously	
2	stipulated that their cases were related to each other, and on May 26, 2011, the Honorable	
3	Claudia Wilken issued an order relating the DiSimone case to the Seebrook and Beltran cases	
4	and reassigned the DiSimone case to her docket;	
5	WHEREAS, on June 1, 2011, plaintiff Kristen Hartman filed the above-referenced putative	
6	class action lawsuit against defendant Children's Place in this Court;	
7	WHEREAS, on June 22, 2011, Children's Place filed an Administrative Motion to	
8	Consider Whether these Actions Should Be Related; and	
9	WHEREAS, plaintiffs' counsel and Children's Place's counsel agree that the Hartman	
10	action should be deemed related to the previously related Seebrook, Beltran, and DiSimone	
11	actions under Local Civil Rule 3-12.	
12	STIPULATION	
13	Now, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties	
14	hereto through their respective counsel of record, that:	
15	1. The Seebrook, Beltran, DiSimone, and Hartman actions are related within the	
16	meaning of Civil Local Rule 3-12; and	
17	2. The Case Management Conference currently set for July 12, 2011 (Seebrook,	
18	Beltran, and DiSimone) should be taken off calendar, and the Parties should be relieved of their	
19	obligations in connection with this Case Management Conference pending the Court's ruling on	
20	the Administrative Motion to Consider Whether these Actions Should Be Related. A Joint Case	
21	Management Conference should be scheduled for a new date.	
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28	[CONTINUED ON NEXT PAGE] 2 Case No. 11-cv-00837-CW	
COOLEY LLP Attorneys At Law San Diego	2. CASE NO. 11-CV-00837-CW	

1	IT IS SO STIPULATED.	
2 3	Dated: June 22, 2011	COOLEY LLP MICHELLE C. DOOLIN (179445) MAZDA K. ANTIA (214963)
4		JENNIFER M. FRENCH (265422)
5		/s/ Jennifer M. French
6		Jennifer M. French
7		Attorneys for Defendant THE CHILDREN'S PLACE RETAIL STORES, INC.
8		THE CHIEDREN STEACE RETAIL STORES, INC.
9		
10	Dated: June 22, 2011	HOFFMAN & LAZEAR H. TIM HOFFMAN (049141)
11		ARTHUR W. LAZEAR (083603) CHAD A. SAUNDERS (257810)
12		
13		
14		/s/ Chad A. Saunders Chad A. Saunders
15		Attorneys for Plaintiff
16		GALINA SEEBROOK
17		
18 19	Dated: June 22, 2011	HARRISON PATTERSON & O'CONNOR LLP JAMES R. PATTERSON (211102) MATTHEW J. O'CONNOR (203334)
20		
21		/s/ James R. Patterson
22		James R. Patterson
23		Attorneys for Plaintiff MARIA ISABEL BELTRAN
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28	[CONTINUED ON NEXT PAGE]	3. CASE NO. 11-CV-00837-CW
COOLEY LLP Attorneys At Law San Diego		J.

1 2 3		RIDOUT & LYON, LLP CHRISTOPHER P. RIDOUT (143931) DEVON M. LYON (218293) CALEB LH MARKER (269721)
4 5 6	C	s/ <i>Caleb LH Marker</i> Caleb LH Marker Attorneys for Plaintiff
7 8	N	VICOLLE DISIMONE
9 10 11	Dated: June 22, 2011 S R	STONEBARGER LAW, APC GENE J. STONEBARGER (209461) RICHARD D. LAMBERT (251148)
12 13	C	s/ Gene J. Stonebarger Gene J. Stonebarger
14 15	A K	Attorneys for Plaintiff KRISTEN HARTMAN
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27 28 Cooley LLP Attorneys At Law San Diego		4. CASE No. 11-CV-00837-CW

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1	FILER'S ATTESTATION		
2	Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that		
3		all parties have concurred in the filing of this Stipulation Regarding Deadline to Respond to	
4	Complaint.		
5	Dated: June 22, 2011 CO	OLEY LLP	
6	MA	CHELLE C. DOOLIN (179445) ZDA K. ANTIA (214963)	
7	JEN	NIFER M. FRENCH (265422)	
8			
9	<u>/s/.</u> Jen	Iennifer M. French nifer M. French	
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11	TH	orneys for Defendant E CHILDREN'S PLACE RETAIL STORES, C.	
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28 Cooley LLP Attorneys At Law San Diego	5.	CASE NO. 11-CV-00837-CW	

1	Order	
2	Based on the foregoing, and good cause appearing, IT IS HEREBY ORDERED that:	
3	1. The Seebrook, Beltran, DiSimone, and Hartman actions are related within the	
4	meaning of Civil Local Rule 3-12.	
5	2. The Case Management Conference currently set for July 12, 2011 (<i>Seebrook</i> ,	
6	Beltran, and DiSimone) shall be taken off calendar, and the Parties are relieved of their	
7	obligations in connection with this Case Management Conference. The Court shall issue a new	
8	scheduling order for a Joint Case Management Conference for all four related cases.	
9	IT IS SO ORDERED.	
10	Dated: 6/24/2011	
11	THE HONORABLE CLAUDIA WILKEN UNITED STATES DISTRICT JUDGE	
12	UNITED STATES DISTRICT JUDGE	
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COOLEY LLP Attorneys At Law San Diego	6. CASE NO. 11-CV-00837-CW	