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5 Attorneys for Defendant  
 6 THE CHILDREN'S PLACE RETAIL STORES, INC.

7 *(See Signature Page for complete list of parties represented.)*

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 OAKLAND DIVISION

12 GALINA SEEBROOK, individually and on  
 behalf of all others similarly situated,

13 Plaintiffs,

14 v.

15 THE CHILDREN'S PLACE RETAIL  
 16 STORES, INC., a Delaware corporation,

17 Defendant.

Consolidated Case No. 11-cv-00837-CW

**STIPULATION AND [PROPOSED] ORDER TO  
 EXTEND DEADLINES RE CLASS  
 CERTIFICATION**

Judge: Hon. Claudia Wilken  
 Place: Courtroom 2, 4th Floor

Trial Dates: Not Yet Set

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 19 MARIA ISABEL BELTRAN, an individual,  
 on behalf herself and of all others similarly  
 20 situated,

21 Plaintiff,

22 v.

23 THE CHILDREN'S PLACE RETAIL  
 24 STORES, INC., a Delaware Corporation; and  
 DOES 1 through 50, inclusive,

25 Defendants.

Case No. 11-cv-01664-CW

1 NICOLLE DiSIMONE, individually, and on  
2 behalf of all others similarly situated,

Case No. 11-cv-02223-CW

3 Plaintiff,

4 v.

5 THE CHILDREN’S PLACE RETAIL  
6 STORES, INC., a Delaware corporation, and  
7 DOES 1 – 500,

8 Defendants.

9 KRISTEN HARTMAN, an individual, on  
10 behalf of herself and all others similarly  
11 situated,

Case No. 11-cv-02604-CW

12 Plaintiffs,

13 v.

14 THE CHILDREN’S PLACE RETAIL  
15 STORES, INC., a Delaware Corporation, and  
16 DOES 1 through 50, inclusive

17 Defendants.

18 Plaintiffs Galina Seebrook, Maria Isabel Beltran, Nicolle DiSimone, and Kristen  
19 Hartman and defendant The Children’s Place Retail Stores, Inc. (“Children’s Place”), by and  
20 through their respective counsel, jointly submit the following stipulation to extend the deadlines  
21 regarding class certification.

22 **RECITALS**

23 **WHEREAS**, the parties have scheduled a mediation before Judge Edward A. Infante  
24 (Ret.) on February 27, 2010; and

25 **WHEREAS**, the parties believe that an extension of the deadlines regarding class  
26 certification is warranted for judicial efficiency and to allow the parties to focus their efforts and  
27 resources on settlement efforts;

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**STIPULATION**

**NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their respective counsel of record, that the dates relating to class certification shall be extended as follows:

- Parties to exchange class expert disclosures and reports for affirmative experts on or before April 6, 2012.
- Parties to exchange class expert disclosures and reports for rebuttal experts on or before May 4, 2012.
- Plaintiffs shall file any motion for class certification on or before June 7, 2012.
- Children’s Place shall file any opposition to class certification on or before July 12, 2012.
- Plaintiffs shall file any reply brief in support of class certification on or before July 26, 2012.
- Hearing on class certification shall be held on August 9, 2012 at 2:00 PM or at the Court’s convenience.

**IT IS SO STIPULATED.**

Dated: December 1, 2011

COOLEY LLP  
MICHELLE C. DOOLIN (179445)  
MAZDA K. ANTIA (214963)  
JENNIFER M. FRENCH (265422)

*/s/ Jennifer M. French*  
\_\_\_\_\_  
Jennifer M. French

Attorneys for Defendant  
THE CHILDREN’S PLACE RETAIL STORES, INC.

1 Dated: December 1, 2011

HOFFMAN & LAZEAR  
H. TIM HOFFMAN (049141)  
ARTHUR W. LAZEAR (083603)  
CHAD A. SAUNDERS (257810)

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*/s/ Chad A. Saunders*

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Chad A. Saunders

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Attorneys for Plaintiff  
GALINA SEEBROOK

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9 Dated: December 1, 2011

PATTERSON LAW GROUP, APC  
JAMES R. PATTERSON (211102)  
MATTHEW J. O'CONNOR (203334)

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*/s/ James R. Patterson*

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James R. Patterson

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Attorneys for Plaintiff  
MARIA ISABEL BELTRAN

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16 Dated: December 1, 2011

RIDOUT & LYON, LLP  
CHRISTOPHER P. RIDOUT (143931)  
DEVON M. LYON (218293)  
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QUALLS & WORKMAN, LLP  
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ROBIN G. WORKMAN (145810)  
AVIVA N. ROLLER (245415)

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*/s/ Christopher P. Ridout*

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Christopher P. Ridout

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Attorneys for Plaintiff  
NICOLLE DiSIMONE

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Dated: December 1, 2011

STONEBARGER LAW, APC  
GENE J. STONEBARGER (209461)  
RICHARD D. LAMBERT (251148)

/s/ Gene J. Stonebarger  
Gene J. Stonebarger

Attorneys for Plaintiff  
KRISTEN HARTMAN

**FILER'S ATTESTATION**

*Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, Jennifer M. French hereby attests that concurrence in the filing of this document has been obtained.*

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**[PROPOSED] ORDER**

Based on the foregoing, and good cause appearing, **IT IS HEREBY ORDERED** that the dates relating to class certification shall be extended as follows:

- Parties to exchange class expert disclosures and reports for affirmative experts on or before April 6, 2012.
- Parties to exchange class expert disclosures and reports for rebuttal experts on or before May 4, 2012.
- Plaintiffs shall file any motion for class certification on or before June 7, 2012.
- Children’s Place shall file any opposition to class certification on or before July 12, 2012.
- Plaintiffs shall file any reply brief in support of class certification on or before July 26, 2012.
- Hearing on class certification shall be held on August 9, 2012 at 2:00 PM.

**IT IS SO ORDERED.** A further Case management conference will also be held on August 9, 2012.

Dated: 12/2/2011

  
\_\_\_\_\_  
THE HONORABLE CLAUDIA WILKEN  
UNITED STATES DISTRICT JUDGE