

1 RANDALL B. AIMAN-SMITH #124599  
 2 REED W.L. MARCY #191531  
 3 HALLIE VON ROCK #233152  
 4 **aiman-smith & marcy**  
 5 7677 oakport street suite 1020  
 6 oakland california 94621  
 7 t:510.562.6800 f:510.562.6830

8 Attorneys for Plaintiff  
 9 Susan Hurtado

10 ALFRED DE LA CRUZ # 151388  
 11 KENNETH KAWABATA # 149391  
 12 MANNING & KASS  
 13 ELLROD RAMIREZ TRESTER LLP  
 14 550 WEST "C" STREET, SUITE 1900  
 15 SAN DIEGO, CALIFORNIA 92101  
 16 TELEPHONE: (619) 515-0269  
 17 FACSIMILE: (619) 515-0268

18 Attorneys for Defendants  
 19 Ikea U.S. West, Inc., et al.

20 IN THE UNITED STATES DISTRICT COURT  
 21 NORTHERN DISTRICT OF CALIFORNIA

22 SUSAN HURTADO, individually and on behalf  
 23 of all others similarly situated,

24 Plaintiffs,

25 v.

26 IKEA U.S. WEST, INC., a corporation, IKEA  
 27 DISTRIBUTION SERVICES, INC. a corporation,  
 28 IKEA NORTH AMERICA CAPITAL, INC., a  
 corporation, IKEA PROPERTY, INC., a  
 corporation, IKEA SUPPLY AG, a corporation,  
 and DOES 1-250,

Defendants.

Case No.: C 11-3156 PJH

**STIPULATION AND [PROPOSED]  
 ORDER TO TRANSFER ACTION TO  
 U.S. DISTRICT COURT, SOUTHERN  
 DISTRICT OF CALIFORNIA**

1 Pursuant to Civil Local Rules 3-13, 7-11 and 7-12, counsel for Susan Hurtado in  
2 *Hurtado v. Ikea U.S. West, Inc., et al.*, Case No. C 11-3156-PJH, and counsel for defendant  
3 Ikea U.S. West, Inc., et al. ("Ikea") jointly submit the following Stipulation that the above-  
4 mentioned action be transferred to United States District Court for the Southern District of  
5 California.

6 WHEREAS, two putative class actions are pending against Ikea in the Southern District  
7 of California (*Medellin v. Ikea U.S. West, Inc.*, No. 3:11-CV-00921-WQH(BGS), filed  
8 February 14, 2011, and *Yeoman v. Ikea U.S. West., Inc.*, No. 3:11-CV-00701-WQH(BGS),  
9 filed March 2, 2011);

10 WHEREAS, each of the *Medellin* and *Yeoman* actions concerns substantially the same  
11 parties, transactions and events, and the potential for unduly burdensome duplication of labor  
12 and expense and conflicting results exists if the cases are in separate jurisdictions;

13 WHEREAS, the *Medellin* action is the lowest-numbered case;

14 WHEREAS, the plaintiffs in the *Medellin* and *Yeoman* actions are in the process of  
15 consolidating their complaints and have agreed to consolidate the *Hurtado* action once  
16 transferred to the Southern District;

17 THEREFORE, the parties hereby stipulate and agree:

18 The action of *Hurtado v. Ikea U.S. West, Inc.*, Case No. C 11-3156-PJH should be  
19 transferred to the Southern District of California.

20  
21 Date: 11/21/2011

/s/ Hallie Von Rock

22 \_\_\_\_\_  
Hallie Von Rock  
23 Attorney for Plaintiff Susan Hurtado

24 Date: 11/21/2011

/s/ Kenneth Kawabata

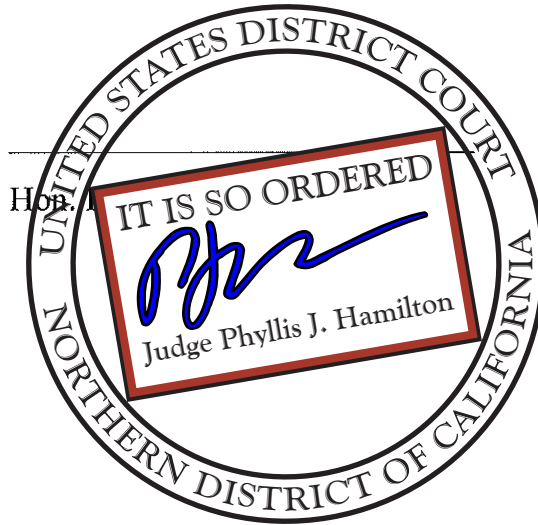
25 \_\_\_\_\_  
Kenneth Kawabata  
26 Attorney for Defendant Ikea U.S. West, Inc.

1 [PROPOSED] ORDER

2 PURSUANT TO STIPULATION, IT IS SO ORDERED:

3 The action of *Hurtado v. Ikea U.S. West, Inc.*, Case No. C 11-3156-PJH, shall be  
4 transferred to the Southern District of California.

5  
6  
7 Date: 11/22/11



9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28