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12 Attorneys for Defendants
 THE GAP, INC., GAP (APPAREL) LLC, GAP
 13 INTERNATIONAL SALES, INC., BANANA
 REPUBLIC LLC, and BANANA REPUBLIC
 14 (APPAREL) LLC

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

17 LAURIE MUNNING, on behalf of herself and
 18 all others similarly situated,

19 Plaintiff,

20 vs.

21 THE GAP, INC., GAP (APPAREL) LLC, GAP
 22 INTERNATIONAL SALES, INC., BANANA
 REPUBLIC LLC, and BANANA REPUBLIC
 23 (APPAREL) LLC,

24 Defendants.

Case No. 4:16-cv-03804-HSG

**JOINT STIPULATION TO CONTINUE
 CASE MANAGEMENT DEADLINES
 AND ORDER**

Hearing Date: N/A

Hearing Time: N/A

Judge: Hon. Haywood S. Gilliam, Jr.

1 The parties jointly stipulate to continue the case management deadlines currently set in
2 this case in order to coordinate discovery with the related case, *Pallagrosi v. Gap, Inc. et al.*, Case
3 No. 4:17-cv-05905-HSG. On January 23, 2018, counsel for Plaintiff and the Gap Defendants
4 appeared before this Court for the Initial Case Management Conference in *Pallagrosi*. At the
5 conference, counsel proposed a new case management schedule so that the schedule in this case
6 would coordinate with discovery in *Pallagrosi*. While *Munning* and *Pallagrosi* are on behalf of
7 two different classes of purchasers, both cases involve the Gap Defendants' alleged sales
8 practices in the marketing of its merchandise. The parties filed a proposed scheduling order in
9 *Pallagrosi* on January 30, 2018. See *Pallagrosi* Dkt. 30. As the parties explained at the
10 conference, many of the documents produced in the two cases by both parties will overlap. In
11 addition, the majority of witnesses to be deposed probably will overlap as well. For this reason,
12 the parties proposed to this Court the intention to have the two cases be coordinated so discovery
13 may track consistently. This will permit the parties to be more efficient and cost effective in the
14 two cases.

15 The parties propose the same schedule as requested in *Pallagrosi*:

- 16 • Fact discovery cutoff
 - 17 ○ The parties propose that all fact discovery will be completed by **June 29, 2018**.
- 18 • Expert disclosures
 - 19 ○ The parties shall provide initial expert disclosures on **July 27, 2018** and
 - 20 rebuttal expert disclosures on **August 24, 2018**. Expert discovery shall be
 - 21 completed by **September 7, 2018**, including expert depositions.
- 22 • L/D to file motion to class certification
 - 23 ○ Plaintiff shall move for class certification in *Munning* on or before **October 5,**
 - 24 **2018**. Defendants shall have 30 days to file their brief in opposition to class
 - 25 certification and Plaintiff shall have 15 days to file her reply brief in support of
 - 26 class certification. The Class Certification hearing shall be on or after
 - 27 **December 6, 2018**.

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- Plaintiffs shall move for class certification in *Pallagrosi* on or before **December 28, 2018**. Defendants shall have 30 days to file their brief in opposition to class certification and Plaintiff shall have 15 days to file her reply brief in support of class certification. The Class Certification hearing shall be on or after **February 28, 2019**.

SO STIPULATED.

Dated: January 31, 2018

LAW OFFICES OF TODD M. FRIEDMAN

By /s/ Todd M. Friedman

Todd M. Friedman

and

DeNITTIS OSEFCHEN, P.C.

Stephen P. DeNittis, Esq. (*admitted pro hac vice*)

Ross H. Schmierer, Esq. (*admitted pro hac vice*)

Attorneys for Plaintiff

LAURIE MUNNING

Dated: January 31, 2018

MORGAN, LEWIS & BOCKIUS LLP

By /s/ Joseph Duffy

Joseph Duffy

Esther K. Ro

Attorneys for Defendants

THE GAP, INC., GAP (APPAREL) LLC, GAP

INTERNATIONAL SALES, INC., BANANA

REPUBLIC LLC, and BANANA REPUBLIC

(APPAREL) LLC

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ATTESTATION

I, Joseph Duffy, am the registered ECF user whose username and password are being used to file this Joint Stipulation. In compliance with LR 5-1(i)(3), I hereby attest that the above-identified counsel concurred in this filing.

Dated: January 31, 2018

By /s/ Joseph Duffy

PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

Dated: February 1, 2018


HONORABLE HAYWOOD S. GILLIAM, JR.
United States District Judge