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11 UNITED STATES DISTRICT COURT
 12 EASTERN DISTRICT OF CALIFORNIA
 13 SACRAMENTO DIVISION

15 MICHELLE RICHARDS, on behalf
 16 of herself and all others similarly
 17 situated and on behalf of the general
 public,

18 Plaintiffs,

19 v.

20 ERNST & YOUNG LLP, and DOES 1
 - 50,

21 Defendants.

Case No. 2:08-CV-01849-GEB-EFB

**STIPULATION AND [PROPOSED]
 ORDER TO TRANSFER ACTION
 TO NORTHERN DISTRICT OF
 CALIFORNIA**

1 Plaintiff Michelle Richards (“Plaintiff”) and Defendant Ernst & Young LLP
2 (“Defendant”), by and through their respective counsel, hereby agree and stipulate as
3 follows:

4 **WHEREAS**, *Ho v. Ernst & Young LLP*, Case No. CV 05-04867 (“The *Ho*
5 Action”) was filed on September 27, 2005 in Santa Clara County Superior Court and
6 was removed to the United States District Court for the Northern District of California
7 on November 29, 2005;

8 **WHEREAS**, *Landon v. Ernst & Young LLP, et al.*, Case No. CV 08-00889 (“The
9 *Landon Action*”) was filed in Placer County Superior Court on February 21, 2008 and
10 was removed to this Court on April 25, 2008;

11 **WHEREAS**, the *Landon Action* was transferred from this Court to the Northern
12 District of California on June 6, 2008 and is now pending in the Northern District of
13 California as Case No. CV 08-02853 and has been deemed related to the *Ho Action*.

14 **WHEREAS**, the instant action was filed in Sacramento County Superior Court
15 on June 19, 2008 and was removed to this Court on August 8, 2008;

16 **WHEREAS**, the instant action involves substantially similar claims and putative
17 classes to those alleged in the *Ho Action*; and

18 **WHEREAS**, the parties acknowledge and agree that the proposed transfer will
19 have no impact on either parties’ procedural or substantive rights. Plaintiff Richards
20 expressly reserves the right to take discovery regarding not only merits discovery but
21 also class certification discovery, and Ernst & Young expressly reserves any proper
22 objections thereto. Ernst & Young expressly reserves the right to take discovery relating
23 to Plaintiff Richards, and Plaintiff Richards expressly reserves any proper objections
24 thereto.

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