

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION

CASE NO.: 11-CV-61923-DIMITROULEAS/SNOW

LORILYNN RICE, KRISTEN GURDAK,
GABRIEL AGUILAR, BRITTANY SOTO,
and LAUREN TAYLOR, on their own
behalfes and others similarly situated,

Plaintiffs,

v.

LUCKY BRAND DUNGAREES
STORES, INC., a Foreign Profit
Corporation

Defendant.

**JOINT MOTION FOR ENLARGEMENT OF TIME TO COMPLY WITH
COURT ORDER DATED JANUARY 9, 2012**

Plaintiffs, LORILYNE RICE, KRISTEN GURDAK, GABRIEL AGUILAR, BRITTANY SOTO and LAUREN TAYLOR (“Plaintiffs”) and Defendant Lucky Brand Dungarees, Inc. (“Defendant”) (collectively, the “Parties”) respectfully request this Court to extend the deadline by which the Parties must file a Joint Stipulation and attached settlement agreement by two weeks or until February 3, 2012. As grounds for this Motion the Parties state:

1. On January 9, 2012, the parties filed a Joint Stipulation of Dismissal with Prejudice.
2. On January 9, 2012, the Court issued an Order Denying, Without Prejudice, Joint Stipulation of Dismissal with Prejudice.

3. The Court's January 9th Order requires Plaintiffs to submit a Joint Stipulation and attached settlement agreement by January 20, 2012, or show cause why it should not do so on or before January 20, 2012.

4. Plaintiffs intend to file a Joint Stipulation attaching the settlement agreement reached between the Parties. However, the settlement agreement includes individuals who are not currently parties to this action. Out of an abundance of caution, Plaintiffs filed a Notice of Consent to Join today (D.E. 15) so that these non-parties to the Parties' settlement agreement may formally join the action.

5. Further, while the Parties have revised the terms of their settlement for public filing, despite their best efforts, the Parties have been unable to secure all of the necessary signatures to the settlement agreement by January 20, 2012. Thus, additional time is needed to secure all needed signatures.

6. The Parties submit that no party will be prejudiced by the extension sought in this Motion and it is not being requested for an improper purpose.

7. Accordingly, the Parties jointly request that the Court extend Plaintiffs' time for submitting the Joint Stipulation by two weeks or until February 3, 2012.

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RESPECTFULLY SUBMITTED, this 20th day of January, 2011.

<p>Jackson Lewis LLP One Biscayne Tower 2 South Biscayne Boulevard, Suite 3500 Miami, FL 33131 Main: (305) 577-7600 Facsimile: (305) 373-4466 Email: natalie.norfus@jacksonlewis.com Counsel for Defendant</p> <p><u>/s/ Natalie E. Norfus</u> Natalie E. Norfus Florida Bar No.: 70109</p>	<p>Law Offices of Robert Rubenstein, P.A. 2 South University Drive, Suite 235 Plantation, FL 33324 Main: (954) 661-6000 Direct: (954) 515-5167 Facsimile: (954) 515-5787 Email: kelly@robertrubenstein.com <i>Trial Counsel for Plaintiff</i></p> <p><u>/s/ Kelly Amritt</u> Kelly Amritt, Esq. Florida Bar No.: 0648779</p>
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