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THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GINA KIM, on behalf of a class consisting of herself and all other persons similarly situated,

Plaintiffs, and as to Ms. Kim, counterclaim defendant,

v.

COACH, INC., a Maryland corporation, and COACH SERVICES, INC., a Maryland corporation,

Defendants, and, as to Coach, Inc., counterclaim plaintiff.

No. 2:11-cv-00214-RSM

**DECLARATION OF R. OMAR RIOJAS
IN SUPPORT OF DEFENDANTS'
MOTION TO STRIKE CLASS
ALLEGATIONS**

I, R. Omar Riojas, declare as follows:

1. Declarant: I am an attorney licensed to practice law in the state of Washington and am admitted to practice before this Court. I work in the Seattle office of DLA Piper LLP (US). I am one of the attorneys representing defendants in the above-captioned lawsuit. I have personal knowledge of the facts stated below and am competent to testify thereto.

2. On March 31, 2011, plaintiff's counsel Jay Carlson and Christopher Carney and defense counsel (Messrs. Keehnel and Eagan and myself) held a Rule 26(f) conference via a conference call. During the Rule 26(f) conference, plaintiff's counsel represented defense

1 counsel that plaintiff Ms. Kim is seeking damages for emotional distress as part of the above-
2 captioned lawsuit.

3
4 I declare under the penalties for perjury under the laws of the United States that the
5 foregoing is true and correct.

6 Signed at Seattle, Washington, on April 14, 2011.

7
8
9 s/ R. Omar Riojas
10 R. Omar Riojas WSBA No. 35400

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on April 14, 2011, I electronically filed the foregoing, under seal,
3 with the Clerk of the Court using the CM/ECF System.

4 Copies of the foregoing document were served on counsel of record via email, by
5 agreement, at the following email addresses:

- 6 • **Jay S Carlson**
7 JayCarlson.legal@gmail.com
- 8 • **Christopher Robert Carney**
9 christopher.carney@cgi-law.com
- 10 • **Jason Moore**
11 jason@vaneyk-moore.com

12 Dated this 14th day of April, 2011.

13 *s/ Stellman Keehnel*
14

Stellman Keehnel, WSBA No. 9309

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