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(See Signature Page for Additional Plaintiffs' Counsel)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

STONEBARGER LAW
A Professional Corporation

GALINA SEEBROOK, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

THE CHILDREN'S PLACE RETAIL
STORES, INC., a Delaware corporation,

Defendant.

MARIA ISABEL BELTRAN, an individual,
on behalf herself and of all others similarly
situated,

Plaintiff,

v.

THE CHILDREN'S PLACE RETAIL
STORES, INC., a Delaware Corporation;
and DOES 1 through 50, inclusive,

Defendants.

Consolidated Case No. 11-cv-00837-CW

**NOTICE OF MOTION AND
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

[Filed concurrently with Class Action
Settlement Agreement; Declaration of
Gene J. Stonebarger; and Proposed Order]

Date: November 29, 2012

Time: 2:00 p.m.

Ctrlm.: 2

Judge: Hon. Claudia Wilken

Related Case No. 11-cv-01664-CW

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NICOLLE DiSIMONE, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

THE CHILDREN'S PLACE RETAIL STORES, INC., a Delaware corporation, and DOES 1 – 500,

Defendants.

Related Case No. 11-cv-02223-CW

KRISTEN HARTMAN, an individual, on behalf of herself and all others similarly situated,

Plaintiffs,

v.

THE CHILDREN'S PLACE RETAIL STORES, INC., a Delaware Corporation, and DOES 1 through 50, inclusive

Defendants.

Related Case No. 11-cv-02604-CW

MARIO ARELLANO, an individual, on behalf of himself and all others similarly situated,

Plaintiffs,

v.

THE CHILDREN'S PLACE RETAIL STORES, INC., a Delaware Corporation, and DOES 1 through 50, inclusive

Defendants.

Related Case No. 12-cv-00803-CW

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1 **TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS:**

2 **PLEASE TAKE NOTICE** that on November 29, 2012, at 2:00 p.m., or as soon
3 thereafter as counsel can be heard in Courtroom 2 of the above-entitled Court located at 1301
4 Clay Street, Oakland, CA 94612, Plaintiffs Galina Seebrook, Maria Isabel Beltran, Nicolle
5 DiSimone, Kristen Hartman, and Mario Arellano will and hereby do move for an Order
6 Preliminarily Approving the Class Action Settlement in this matter pursuant to Federal Rule of
7 Civil Procedure 23, including each of the following:

- 8 (1) preliminarily approving the Settlement Agreement as being fair, reasonable, and
9 adequate;
- 10 (2) provisionally certifying the Class under Fed. R. Civ. P. 23 for settlement purposes
11 only;
- 12 (3) preliminarily approving the form, manner, and content of the Class Notices and
13 Claim Form;
- 14 (4) appointing Plaintiffs Galina Seebrook, Maria Isabel Beltran, Nicolle DiSimone,
15 Kristen Hartman, and Mario Arellano as the Class representatives;
- 16 (5) appointing the law firms of Stonebarger Law, APC, Hoffman & Lazear, Patterson
17 Law Group, APC, Ridout & Lyon, LLP, Qualls & Workman, LLP, and the Law Office of Sunil
18 A. Brahmhatt, PLC as counsel for the Class; and
- 19 (6) setting the date and time of the Fairness Hearing.

20 This motion for preliminary approval of a class action settlement is based upon this
21 notice of motion and motion, the accompanying memorandum of points and authorities, the
22 supporting Declaration of Gene J. Stonebarger, the records and files in this action, and upon such
23 further and additional papers and argument as may be presented herein.

24 Dated: October 25, 2012

STONEBARGER LAW, APC

25 By: /s/ Gene J. Stonebarger
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