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23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO / OAKLAND DIVISION

26 EDUARDO GONZALEZ, ANTHONY
27 OCAMPO, ENCARNACION
28 GUTIERREZ, JOHAN MONTOYA,
JUANCARLOS GÓMEZ-MONTEJANO,

Case No. 03-2817 SI

**STIPULATION AND JOINT STATEMENT
SUPPORTING NOTICE OF RELATED
CASES AND [PROPOSED] ORDER**

--[caption continues]--

1 JENNIFER LU, AUSTIN CHU, IVY
2 NGUYEN, ANGELINE WU, ERIC
3 FIGHT, CARLA GRUBB, DAVID
4 CULPEPPER, PATRICE DOUGLASS,
5 ROBAIR SHERROD, BRANDY HAWK,
6 and ANDRE STEELE on behalf of
7 themselves and all others similarly situated,

8 Plaintiffs,

9 v.

10 ABERCROMBIE & FITCH STORES,
11 INC., A&F CALIFORNIA, LLC, A&F
12 OHIO, INC., AND ABERCROMBIE &
13 FITCH MANAGEMENT CO.

14 Defendants.

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Pursuant to Local Rule 3-12, the undersigned who are counsel for plaintiffs and defendants ("all parties") in the above captioned matter, in *EEOC v. Abercrombie & Fitch*, Case No. 04-04731 TEH (N.D. Cal., filed Nov. 8, 2004); and in *West v. Abercrombie & Fitch*, Case No. 04-04730 MEJ (N.D. Cal., filed Nov. 8, 2004) hereby stipulate that these three cases satisfy the definition of "related cases" as contained in L.R. 3-12(b). These three cases – all involving allegations of employment discrimination at the same single employer – involve substantially the same parties, events, and questions of law; and conducting the cases in front of different judges will involve unduly burdensome duplication of labor and expense.

Undersigned counsel intend to seek preliminary approval later this week of a joint, proposed consent decree fully resolving these matters. Permitting these actions to be heard before a single judge will facilitate settlement.

Notices of Related Cases have been filed in each action identifying the other two actions as related. Pursuant to L.R. 3-12(d), all parties submit this joint statement supporting the Notice of Related Cases filed for the above captioned matter and the Notices of Related Cases filed in *EEOC v. Abercrombie & Fitch* and *West v. Abercrombie & Fitch*.

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1 Dated: November 9, 2004, 2004

2 Respectfully submitted,

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24 November 9, 2004

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ORDER

Good cause appearing, IT IS HEREBY ORDERED that pursuant to Local Rule 3-12, the Court will hear *EEOC v. Abercrombie & Fitch*, Case No. 04-04731-TEH and *West v Abercrombie & Fitch*, Case No. 04-4730-MEJ at

IT IS SO ORDERED.

Dated: November ____ 2004

