

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

MAYA SCHULERT, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

HUDSON CLOTHING, LLC,

Defendant.

CASE NO. 2:15-cv-00276-JDL

**PLAINTIFF'S CONSENTED TO MOTION FOR A STAY
WITH INCORPORATED STATUS REPORT**

Plaintiff alleges:

1. The claims set forth in the above-captioned case are also set forth in pre-existing putative class action cases in California styled as *Noiman v. Hudson Clothing*, San Diego Superior Court Case No. 37-2015-00000566-CU-BT-CTL, which was consolidated with *Card v. Joe's Jeans*, San Diego Superior Court, Case No. 37-2015-00021834-CU-BT-CTL (hereinafter collectively referred to as the "California Actions"). The California Actions are currently pending before the Honorable Joan M. Lewis of the San Diego Superior Court (the "California Court").
2. The California Court recently held a hearing on Plaintiff's Motion for Preliminary Approval of Class Action Settlement on December 2, 2016;
3. After lengthy oral argument, the California Court continued the hearing date on Plaintiff's Motion for Preliminary Approval of Class Action Settlement to February 17, 2017 to permit the parties to present the California Court with supplemental filings;
4. This case would not need to be prosecuted further if the California Court ultimately grants preliminary and subsequently final approval of the class action settlement negotiated in the California Actions (the California settlement includes a release of all claims by putative class members nationwide that would effectively release all claims set in this action);
5. The parties reasonably anticipate that the California Court should be able to hear and rule on Plaintiff's motion for final approval of the class settlement (and have Final Judgment entered accordingly) by August 2017;

Wherefore, the parties to this case respectfully request that this Court issue an order:

1. Requiring the parties to report the status of the California Actions in 90 and 180 days;
and
2. Staying this case until September 1, 2017, by which time the parties to this case will determine whether a Final Judgment was entered in the California Actions so as to determine if a dismissal of this case is appropriate at such time; and,
3. Granting such other relief as is necessary and proper.

Dated: December 11, 2016

/s/ Robert E. Mittel
Robert E. Mittel
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CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2016, I electronically filed the foregoing document titled **PLAINTIFF'S CONSENTED TO MOTION FOR STAY WITH INCORPORATED STATUS REPORT** with the Clerk of Court using the CM/ECF system, which will send the notification of such filing to counsel for defendant, and which will cause an electronic notice to be sent to registered counsel of record.

/s/ Robert E. Mittel
Robert E. Mittel