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Attorneys for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JEANNE and NICOLAS STATHAKOS, on
behalf of themselves and all others similarly
situated,

PLAINTIFFS,

vs.

COLUMBIA SPORTSWEAR COMPANY,
COLUMBIA SPORTSWEAR USA
CORPORATION,

DEFENDANTS.

Case No. 4:15-cv-04543-YGR

**JOINT NOTICE OF SETTLEMENT AND
STIPULATION TO STAY ACTION AND
VACATE DEADLINES PENDING
SETTLEMENT APPROVAL**

Hon. Yvonne Gonzalez Rogers

1 WHEREAS, Plaintiffs Jeanne and Nicolas Stathakos, and Defendants Columbia Sportswear
2 Company and Columbia Brands USA, LLC (f.k.a. Columbia Sportswear USA Corporation)
3 (Plaintiffs and Columbia are collectively referred to as the “Parties”), through their respective
4 undersigned counsel, notify the Court that on September 21, 2017, they executed a Settlement Term
5 Sheet that sets forth the material terms of a class action settlement.

6 WHEREAS, the material terms of the Parties’ class action settlement reflected in the
7 Settlement Term Sheet resolve all of Plaintiffs’ claims in this Action.¹

8 WHEREAS, the Parties are in the process of memorializing their agreement in a
9 comprehensive written Stipulation of Settlement.

10 WHEREAS, the Parties intend to finalize the comprehensive Stipulation of Settlement by
11 September 29, 2017.

12 WHEREAS, following the execution of the Stipulation of Settlement, Plaintiffs will file an
13 unopposed Motion for Preliminary Approval by October 6, 2017.

14 WHEREAS, given that the Parties’ have reached a class action in principle, good cause exists
15 to stay this Action, and vacate the current pretrial and trial deadlines set forth in the Court’s Case
16 Management and Pretrial Order [DE # 116].

17 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE AS
18 FOLLOWS:

- 19 (1) that the Action be stayed pending approval of the settlement;
20 (2) that the pretrial deadlines and trial date be vacated;
21 (3) that Plaintiffs shall file an unopposed Motion for Preliminary Approval by October 6,
22 2017; and
23 (4) that Plaintiffs’ Motion for Preliminary Approval shall be heard on October 31, 2017 at
24 2:00 p.m., the date previously set for the hearing on Plaintiffs’ Motion for Summary
25 Judgment, or on such other date that is convenient for the Court.

26
27 ¹ The Settlement Term Sheet reflects the parties’ agreement with respect to Plaintiffs’ claims, and
28 the claims of the Rule 23(b)(2) class certified in this Action, and their agreement to a procedure to
resolve any fees or service award that may be sought by Plaintiffs or their counsel. The procedure for
resolving the fee and service award issue will be described in the Motion for Preliminary Approval.

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**UNITED STATES DISTRICT COURT
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vs.

COLUMBIA SPORTSWEAR COMPANY,
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DEFENDANTS.

Case No. 4:15-cv-04543-YGR

**[PROPOSED] ORDER GRANTING
STIPULATION TO STAY ACTION AND
VACATE DEADLINES PENDING
SETTLEMENT APPROVAL**

Hon. Yvonne Gonzalez Rogers

1 The Court, having review the Joint Notice of Settlement and Stipulation to Stay Action and
2 Vacate Deadlines Pending Settlement Approval submitted by Plaintiffs Jeanne and Nicolas Stathakos
3 (“Plaintiffs”) and Defendants Columbia Sportswear Company and Columbia Brands USA, LLC
4 (f.k.a. Columbia Sportswear USA Corporation) (collectively, “Columbia”), hereby ORDERS as
5 follows:

- 6 (1) that the Action is stayed pending approval of the settlement;
7 (2) that the pretrial deadlines and trial date are vacated;
8 (3) that Plaintiffs shall file an unopposed Motion for Preliminary Approval by October 6,
9 2017; and
10 (4) that Plaintiffs’ Motion for Preliminary Approval shall be heard

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13 Dated: September ____, 2017

14 Honorable Yvonne Gonzalez Rogers
15 United States District Court Judge
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