

1 Bill Lann Lee (SBN 108452)
2 Kelly M. Dermody (SBN 171716)
3 Eve H. Cervantez (SBN 164709)
4 Elizabeth A. Alexander (*pro hac vice*)
5 Jahan C. Sagafi (SBN 224887)
6 Nirej S. Sekhon (SBN 213358)
7 LIEFF, CABRASER, HEIMANN &
8 BERNSTEIN, LLP
9 275 Battery Street, 30th Floor
10 San Francisco, CA 94111-3339
11 Telephone: (415) 956-1000
12 Facsimile: (415) 956-1008

13 Thomas A. Saenz (SBN 159430)
14 Shaheena Ahmad Simons (SBN 225520)
15 MEXICAN AMERICAN LEGAL DEFENSE
16 AND EDUCATIONAL FUND
17 634 South Spring Street
18 Los Angeles, CA 90014
19 Telephone: (213) 629-2512
20 Facsimile: (213) 629-0266

21 Joseph C. Kohn
22 Martin J. D'Urso
23 Hilary Cohen
24 KOHN, SWIFT & GRAF, P.C.
25 One South Broad Street, Suite 2100
26 Philadelphia, PA 19107
27 Telephone: (215) 238-1700
28 Facsimile: (215) 238-1968

Jack W. Lee, Esq. (SBN 071626)
Lisa Duarte, Esq. (SBN 169750)
John Ota, Esq. (SBN 195532)
MINAMI, LEW & TAMAKI LLP
360 Post Street, 8th Floor
San Francisco, CA 94108
Telephone: (415) 788-9000
Facsimile: Fax (415) 398-3887

Attorneys for Plaintiffs and Defendants

[Additional Counsel listed on Signature Page]

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

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

--[caption continues]--

Douglas R. Young
Sandra A. Kearney
FARELLA BRAUN & MARTEL, LLP
Russ Building, 30th Floor
235 Montgomery Street
San Francisco, CA 94104
Telephone: (415) 954-4400
Facsimile: (415) 954-4481

Thomas Brennan Ridgley
Jonathan M. Norman
Sandra J. Anderson
Mark Knueve
VORYS, SATER, SEYMOUR & PEASE
LLP
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008
Telephone: 614-464-6400
Facsimile: 614-464-6350

Anna Y. Park (SBN 164242)
Peter F. Laura (SBN 116426)
U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
255 East Temple Street, 4th Floor
Los Angeles, CA 90012

John C. Hendrickson (IL SBN 1187589)
Gregory M. Gochanour (IL SBN 6210804)
U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
500 West Madison Street, Suite 2800
Chicago, IL 60661

Case No. 03-2817 SI

**STIPULATION AND [PROPOSED]
ORDER TO FILE UNDER SEAL**

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.

15 WHEREAS that attached documents contain materials produced for confidential
16 mediation;

17 The parties in the above-captioned matter, through their counsel of record, hereby
18 stipulate and agree that the Plaintiffs' Mediation Brief and the Plaintiffs' Mediation Letter, both
19 attached hereto as Exhibits 1 and 2, shall be filed under seal in this action.

20 Dated: November 12, 2004

21 Respectfully submitted,

22 Thomas A. Saenz
23 Shaheena Ahmad Simons
24 MEXICAN AMERICAN LEGAL DEFENSE
25 AND EDUCATIONAL FUND
26 634 South Spring Street, 11th Floor
27 Los Angeles, CA 90014

28 Bill Lann Lee
Kelly M. Dermody
Eve H. Cervantez
Elizabeth A. Alexander (pro hac vice)
Jahan C. Sagafi
Nirej S. Sekhon
LIEFF, CABRASER, HEIMANN
& BERNSTEIN, LLP
275 Battery Street, 30th Floor
San Francisco, CA 94111-3339

29 Julie Su
30 Minah Park
31 ASIAN PACIFIC AMERICAN LEGAL
32 CENTER
33 1145 Wilshire Blvd., 2nd Floor
34 Los Angeles, CA 90017

35 Joseph C. Kohn
36 Martin J. D'Urso
37 Hilary Cohen
38 KOHN, SWIFT & GRAF, P.C.
39 One South Broad Street
40 Philadelphia, PA 19107

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

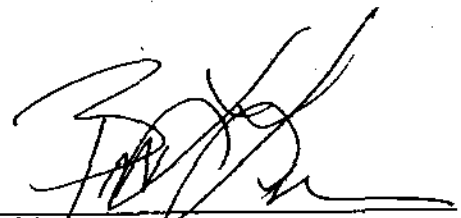
Kimberly West-Faulcon
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
1055 Wilshire Blvd., Suite 1480
Los Angeles, CA 90017

Bryan L. Clobes
Melody Forrester
Jeffrey D. Lerner
MILLER FAUCHER AND CAFFERTY
One Logan Square, Suite 1700
Philadelphia, PA 19103

Sidney L. Gold
Traci M. Greenberg
SIDNEY L. GOLD & ASSOCIATES, P.C.
1835 Market Street
Philadelphia, PA 19103

Cleo Fields
THE FIELDS LAW FIRM, L.L.C.
2147 Government Street
Baton Rouge, LA

James F. Keller
Zachary Gottesman
GOTTESMAN & ASSOCIATES
2121 URS Center
36 East 7th Street
Cincinnati, OH 45202



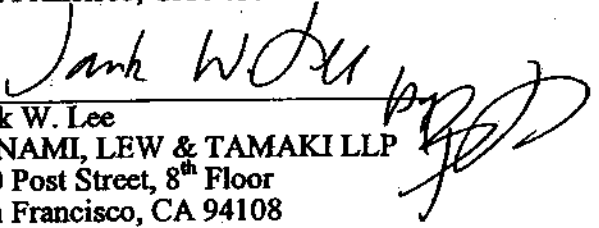
November __, 2004

Bill Lann Lee
LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
275 Battery Street, 30th Floor
San Francisco, CA 94111-3339

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Jack W. Lee, Esq. (SBN 071626)
Lisa Duarte, Esq. (SBN 169750)
John Ota, Esq. (SBN 195532)
MINAMI, LEW & TAMAKI LLP
360 Post Street, 8th Floor
San Francisco, CA 94108

November __, 2004



Jack W. Lee
MINAMI, LEW & TAMAKI LLP
360 Post Street, 8th Floor
San Francisco, CA 94108

Attorneys for Plaintiff West, et al.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

November __, 2004

ERIC S. DREIBAND
General Counsel

JAMES LEE
Deputy General Counsel

GWENDOLYN YOUNG REAMS
Associate General Counsel

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
1801 "L" Street, N.W.
Washington, D.C. 20507

By: *Anna Y. Park*
ANNA Y. PARK
Regional Attorney *hjp*

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
255 East Temple Street, 4th Floor
Los Angeles, CA 90012

By: *John C. Hendrickson*
JOHN C. HENDRICKSON
Regional Attorney
GREGORY M. GOCHANOUR
Supervisory Trial Attorney *hjp*

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
500 West Madison Street, Suite 2800
Chicago, IL 60661

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

November 12, 2004

Douglas R. Young
Sandra A. Kearney
FARELLA BRAUN & MARTEL, LLP
Russ Building, 30th Floor
235 Montgomery Street
San Francisco, CA 94104

Thomas Brennan Ridgley
Jonathan M. Norman
Sandra J. Anderson
Mark Kneve
VORYS, SATER, SEYMOUR & PHASE LLP
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008

Douglas R. Young

Douglas R. Young
Sandra A. Kearney
FARELLA BRAUN & MARTEL, LLP
Russ Building, 30th Floor
235 Montgomery Street
San Francisco, CA 94104

Attorneys for Defendant Abercrombie & Fitch, et al.

ORDER

The foregoing is stipulated and approved and is so **ORDERED**.
IT IS SO ORDERED.

Dated: November __, 2004

The Honorable Susan Histon
UNITED STATES DISTRICT JUDGE