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6 Attorneys for Plaintiff
CENTER FOR ENVIRONMENTAL HEALTH
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9 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 IN AND FOR THE COUNTY OF ALAMEDA
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12 PEOPLE OF THE STATE OF CALIFORNIA,)
13 ex rel. BILL LOCKYER, Attorney General,)
14 Plaintiffs,)
15 v.)
16 BURLINGTON COAT FACTORY)
WAREHOUSE CORPORATION, et. al.,)
17 Defendants.)

Lead Case No. RG 04-162075

(Consolidated with Case Nos. RG 04-162037 and RG 04-169511)

**STIPULATED CONSENT JUDGMENT
AS TO CORNERSTONE APPAREL,
INC.**

Complaint Filed: June 23, 2004
Trial Date: None

18 _____)
19 And Related and Consolidated Cases)
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1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 *Whereas*, on June 23, 2004 plaintiff the Center for Environmental Health (“CEH”)
3 filed action no. RG 04-162037, which action was consolidated with two other actions including
4 the lead case entitled *People v. Burlington Coat Factory et al.*, action no. RG 04-162075;

5 *Whereas*, Cornerstone Apparel, Inc. (“Cornerstone”) is a defendant in the action
6 by CEH;

7 *Whereas*, on February 21, 2006, upon noticed motion, the Court entered a Consent
8 Judgment in the consolidated actions (the “Master Consent Judgment”);

9 *Whereas*, on June 15, 2006, upon noticed motion, the Court amended the Master
10 Consent Judgment by entering an Amended Consent Judgment in the consolidated actions, a true
11 and correct copy of which is attached hereto as Exhibit 1 (in order to minimize the size of Exhibit
12 1, the attached Amended Consent Judgment does not include certain signature pages or Exhibit
13 A (list of initial defendants), Exhibit E (brand names from initial defendants), Exhibit F (initial
14 defendant notice list), Exhibit G (copies of Notices of Intent to Opt In) and Exhibit H (Roman
15 Company signature page) (the “Amended Master Consent Judgment”);

16 *Whereas*, CEH and Cornerstone have agreed to resolve this matter as to
17 Cornerstone on the same injunctive terms as those contained in the Amended Master Consent
18 Judgment;

19 *Now Therefore*, the parties hereto agree as follows:

20 1. Judgment shall be entered against Cornerstone in this consolidated action
21 pursuant to the terms of the Amended Master Consent Judgment, except that the following terms
22 shall apply to Cornerstone in lieu of Section 5 of the Consent Judgment.

23 a. Within seven calendar days of entry of this Stipulated Consent Judgment,
24 Cornerstone shall pay the sum of \$49,500 as a settlement payment. The settlement payment shall
25 be by check made payable to the Lexington Law Group, LLP Attorney Client Trust Account.

26 The funds paid by Cornerstone shall be distributed as follows:

27 i. The sum of \$16,167 as payment to CEH in lieu of penalty pursuant
28 to Health and Safety Code section 25249.7(b), and California Code

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of Regulations, title 11, section 3202(b). CEH shall use such funds to continue its work educating and protecting people from exposures to toxic chemicals, including heavy metals.

ii. The sum of \$1,000 as a civil penalty pursuant to Health & Safety Code §25249.7(b), such money to be apportioned by CEH in accordance with Health & Safety Code §25192.

ii. The sum of \$32,333 as reimbursement of CEH's reasonable attorneys' fees and investigation costs.

b. The last sentence in Section 3.1 shall be replaced with the following sentence:

Each Settling Defendant shall provide the requirements of this Consent Judgment to its Suppliers of Covered Products no later than August 30, 2006, and shall request each Supplier to use best efforts to provide compliant product as soon as commercially practicable.

2. In all other respects, Cornerstone shall be treated as if it were an Initial Settling Defendant, as that term is used in the Consent Judgment.

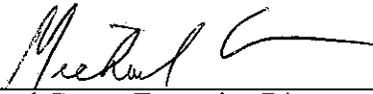
3. The persons for Cornerstone to receive Notices per § 4.2.2.2 and Exhibit F to the Consent Judgment, until and unless modified per § 8, shall be:

Steven C. Kim
Steven C. Kim & Associates
3701 Wilshire Blvd.
Los Angeles, CA 90010

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IT IS SO STIPULATED.

CENTER FOR ENVIRONMENTAL HEALTH

By: 
Michael Green, Executive Director

CORNERSTONE APPAREL, INC.

By: _____

Printed Name: _____

Title: _____

JUDGMENT SO RENDERED.

_____, 2006

JUDGE OF THE SUPERIOR COURT

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IT IS SO STIPULATED.

CENTER FOR ENVIRONMENTAL HEALTH

By: _____
Michael Green, Executive Director

CORNERSTONE APPAREL, INC.

By: _____


Printed Name: TAE Y. YI

Title: C.F.O.

JUDGMENT SO RENDERED.

_____, 2006

JUDGE OF THE SUPERIOR COURT