

1 Clifford A. Chanler (Bar No. 135534)
2 Laurence D. Haveson (Bar No. 152631)
3 Josh Voorhees (Bar No. 241436)
4 Troy C. Bailey (*Pro Hac Vice*)
5 THE CHANLER GROUP
6 2560 Ninth Street
7 Parker Plaza, Suite 214
8 Berkeley, CA 94710-2565
9 Telephone: (510) 848-8880
10 Facsimile (510) 848-8118

11 Attorneys for Plaintiffs
12 ANTHONY E. HELD, Ph.D., P.E. and
13 JOHN MOORE

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO
UNLIMITED JURISDICTION

ANTHONY E. HELD, Ph.D., P.E.,
Plaintiff,

v.

ALDO U.S., INC., ALDO GROUP, INC, *et al.*,
Defendants.

Case Nos. CGC-10-497729 and CGC-10-498981 (Consolidated Herein)

STIPULATION FOR ENTRY OF JUDGMENT

JOHN MOORE,

Plaintiff,

v.

KATE SPADE, LLC, *et al.*,
Defendants.

1 1. The following constitutes the knowing and voluntary election and stipulation of
2 the entity named below (“Company” or “Opt-In Settling Defendant”) to join as a Settling
3 Defendant under the Consent Judgment previously entered by the Court in the above-captioned
4 actions, *Held v. Aldo U.S., Inc. and Aldo Group, Inc., et al.*, San Francisco Superior Court Case
5 No. CGC-10-497729 and *Moore v. Kate Spade, LLC., et al.*, San Francisco Superior Court
6 Case No. CGC-10-498981, consolidated therein, (the “Action”) and to be bound by the terms
7 of that Consent Judgment.

8 2. The terms of the Consent Judgment apply to the Opt-In Settling Defendant only
9 as to those categories of Fashion Accessories selected on Exhibit A, attached hereto, which are
10 also Covered Products.

11 3. At any time during the three-year period prior to the filing of this Stipulation
12 (“Relevant Period”), the Company has employed ten or more part-time or full-time persons and
13 has manufactured, imported, distributed, or offered for use or sale in California one or more
14 items in each of the following selected categories of Fashion Accessories as defined in the
15 Consent Judgment (section 2.5) and that are Covered Products as defined in the Consent
16 Judgment (section 2.2) (check all that apply for which no previous Proposition 65 notice has
17 been issued by plaintiff):

- 18 Wallets and other coin or bill holders
- 19 Handbags, purses, clutches and totes
- 20 Belts
- 21 Footwear
- 22 Apparel, including gloves and headwear (and excluding sauna suits)
- 23 Jewelry
- 24 Key holders, keychains, and key caps
- 25 Luggage tags and ID cases
- 26 Bag charms and zipper pulls
- 27 Eyeglass cases


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1 If the Company desires to change the individual and/or address designated to receive notice on
2 its behalf, the Company shall provide written notice to plaintiffs' counsel via certified mail,
3 return receipt requested or overnight courier at the address listed in Section 7.1 and to Settling
4 Defendants' designated contacts via email at the email addresses shown on their Exhibit Bs.

5 11. The undersigned have read, and the person and/or entity named below
6 knowingly and voluntarily agree to be bound by, all terms and conditions of this Stipulation
7 and the Consent Judgment as previously approved and entered by the San Francisco County
8 Superior Court in this Action.

9 12. The undersigned has full authority to make the written representations above
10 and to enter into this Stipulation for the person/entity on behalf of which he/she is signing.

11
12 **IT IS HEREBY STIPULATED AND AGREED TO:**

13
14 By:  _____
15 (signature)

16 Jesse Simpkins
17 Name (printed/typed)

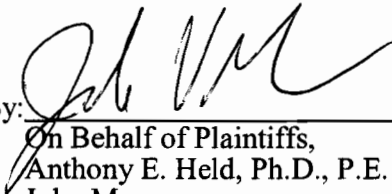
18 Vice President Marketing
19 Title (printed/typed)

20 On Behalf of:

21 Plano Molding Company
22 (Insert Company Name)

23 Opt-In Settling Defendant

24 Dated: 12-27-10

By:  _____
On Behalf of Plaintiffs,
Anthony E. Held, Ph.D., P.E. and
John Moore

Dated: 1/5/11

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1 Exhibit A

2 **Name of Settling Defendant** (and relevant associated entities under common ownership):

3 Plano

4 Plano Molding Company

5 Caboodles

6 Creative Options

7 _____

8 _____

9

10 **Fashion Accessories Categories Applicable to above.** Select all categories for which a
11 Proposition 65 notice for DEHP has previously been issued by plaintiffs, as well as the additional
categories selected in the Opt-In Stipulation.

12 Wallets and other coin or bill holders

13 Handbags, purses, clutches and totes

14 Belts

15 Footwear

16 Apparel, including gloves and headwear (and excluding sauna suits)

17 Jewelry

18 Key holders, keychains, and key caps

19 Luggage tags and ID cases

20 Bag charms and zipper pulls

21 Eyeglass cases

22 Coverings/cases for mobile electronic devices (e.g., for telephones, cameras, MP3 players,
23 CDs/DVDs, and laptops

24 Coverings for journal/address books

25 Cosmetic cases/bags

26 Toiletry cases/bags

27

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Exhibit B

Person(s) to receive Notices Pursuant to Section 7.1 of the Consent Judgment

Susan L. Germaise/McGuireWoods

Name

Michael Lusk/McGuireWoods LLP

Name

Attorney

Title

Attorney

Title

1800 Century Park East, 8th Floor

Address Line 1

77 West Wacker Drive, Suite 4100

Address Line 1

Los Angeles, CA 90067

Address Line 2

Chicago, IL 60601-1818

Address Line 2

sgermaise@mcguirewoods.com

Email Address

mlusk@mcguirewoods.com

Email Address