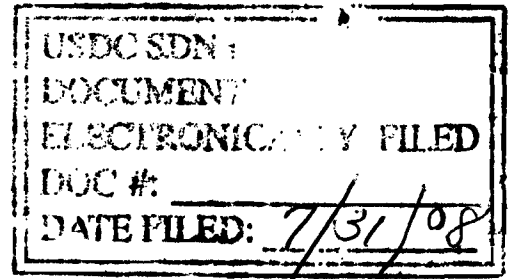


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



DEBRA HALL, Individually and on Behalf of All Others Similarly Situated,	X	Civil Action No. 07-cv-8252 (SAS)
		:(Consolidated)
Plaintiff,		:
		: <b>STIPULATION AND</b>
vs.		:[ <b>PROPOSED</b> ] <b>SCHEDULING ORDER</b>
		:
THE CHILDREN'S PLACE RETAIL STORES, INC., et al.,		: Conference Date: July 31, 2008
		:
Defendants.		:
	X	

WHEREAS, on July 18, 2008, the Court issued an Opinion and Order denying defendants' motions to dismiss and scheduling a pretrial conference for July 31, 2008 at 3:30 p.m.;

WHEREAS, pursuant to Rule IV.A.2 of this Court's Individual Rules and Procedures, the parties must submit a proposed Scheduling Order in the form hereof to the Court at the pretrial conference;

NOW, THEREFORE, the parties hereby submit the following information to the Court:

1. The date of the conference is July 31, 2008 and the appearances of counsel for the parties are as follows:

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
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Joseph Russello  
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*Lead Counsel for Lead Plaintiff  
Northern Nevada Laborers Fund*

*Counsel for Defendants The Children's Place  
Retail Stores, Inc. and Susan Riley*

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*Counsel for Defendant Ezra Dabah*

2. At issue in this case are plaintiff's allegations that the defendants violated the anti-fraud provisions of the federal securities laws by, among other things, (i) allegedly engaging in stock options backdating and spring-loading practices that resulted in the dissemination of false financial statements by defendant The Children's Place Retail Stores, Inc. ("Children's Place"); and (ii) allegedly issuing certain false and misleading statements regarding the relationship between Children's Place and non-party The Walt Disney Company; and whether these alleged actions caused damage to plaintiff.

3. The parties agree to the following discovery schedule:

(a) Depositions:

i. The parties anticipate designating deponents as discovery proceeds.

ii. The parties are discussing the number of depositions that may be taken by each side and whether any changes to the limitations set forth in Fed. R. Civ. P. 30(a)(2)(A) will be necessary.

iii. The parties anticipate completing depositions of party and non-party fact witnesses on or before ~~July 17~~ <sup>April 30</sup>, 2009.

(b) Document Discovery:

i. The parties will serve written discovery requests on each other on or before August 22, 2008 and will serve their respective responses and objections to such written discovery requests on or before September 26, 2008. *(and plaintiffs will make automatic disclosures)* *(and defendants will make then automatic disclosures)*

ii. Plaintiff will ~~begin producing~~ *produce* documents responsive to defendants' requests on or before September 26, 2008. Defendants will begin producing documents responsive to plaintiff's requests on ~~October 31, 2008~~ *September 26* and will produce all documents *by end of November*

(c) Expert Discovery:

i. Excepting class certification expert reports, which are subject to section 5(a) below, the parties will exchange expert reports on or before ~~August 28, 2009~~ *June 15 June 1, 2009*

ii. The parties will complete expert depositions on or before ~~October 2, 2009~~ *July 15*

(d) Fact and expert discovery will be completed on or before ~~October 2, 2009~~ *July 15*

(e) Plaintiff will supply its pretrial order matters to defendants at a date to be determined after the completion of discovery.

(f) The parties will submit a pretrial order in a form that conforms with the Court's instructions together with their trial briefs and proposed *voir dire* questions and proposed jury instructions after the completion of discovery and the determination of any motions for summary judgment.

(g) A final pretrial conference pursuant to Fed. R. Civ. P. 16(d) shall take place before the Court on *July 30*, 2009, at *4<sup>30</sup>*.

4. A Stipulation and [Proposed] Confidentiality Order will be negotiated by the parties, and submitted to the Court for its approval by September 5, 2008.

5. No discovery issues are currently outstanding between the parties. Nevertheless, the parties wish to bring the following scheduling issues to the Court's attention:

(a) Class Certification: Plaintiff will serve and file its motion for class certification, together with its opening papers and any expert reports in support, within 15 days of the completion of defendants' production of documents concerning the issue of numerosity. The parties will agree upon a schedule for defendants' discovery on the issue of class certification and submission of briefs and expert reports in opposition to the motion, and for plaintiff's reply to such opposition. *Nov. 14 / Dec 31 / JAU. # 20*

~~(b) Summary Judgment: The parties may serve and file any motion for summary judgment, together with their respective opening papers in support thereof, on or before November 13, 2009. The parties will agree upon a briefing schedule with respect to any opposition to the respective motions and any reply to such opposition.~~

6. At this juncture, the parties anticipate submitting expert testimony on the issues of ~~class certification~~, causation and damages. The parties may also submit expert testimony on other issues that arise during the discovery process or thereafter.

7. The parties anticipate that a jury trial of this matter will last approximately 21 days.

8. This Scheduling Order may be altered or amended only upon a showing of good cause not foreseeable at the time of the conference or when justice so requires.

*– Signatures Appear on Following Page –*

Dated: July 31, 2008  
Melville, New York

Dated: July \_\_\_\_\_, 2008  
New York, New York

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP

WEIL, GOTSHAL & MANGES LLP

By: 

By: 

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*Lead Counsel for Lead Plaintiff  
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*Counsel for Defendant Ezra Dabah*

\*

\*

\*

July 31, 2008  
DATE

**SO ORDERED.**  
  
THE HONORABLE SHIRA A.  
SCHEINDLIN  
UNITED STATES DISTRICT JUDGE