1 GIBSON, DUNN & CRUTCHER LLP LICHTEN & LISS-RIORDAN, P.C. THEODORE J. BOUTROUS, JR., SBN 132099 SHANNON LISS-RIORDAN, pro hac vice 2 tboutrous@gibsondunn.com sliss@llrlaw.com ADELAIDE PAGANO, pro hac vice THEANE D. EVANGELIS, SBN 243570 3 tevangelis@gibsondunn.com apagano@llrlaw.com DHANANJAY S. MANTHRIPRAGADA, SBN 729 Boylston Street, Suite 2000 4 254433 Boston, MA 02116 dmanthripragada@gibsondunn.com 5 Telephone: (617) 994-5800 333 South Grand Avenue Facsimile: (617) 994-5801 6 Los Angeles, CA 90071-3197 Telephone: 213.229.7000 CARLSON LEGAL SERVICES 7 Facsimile: 213.229.7520 MATTHEW CARLSON, SBN 273242 mcarlson@carlsonlegalservices.com 8 JOSHUA S. LIPSHUTZ, SBN 242557 100 Pine Street, Suite 1250 9 jlipshutz@gibsondunn.com San Francisco, CA 94111 KEVIN J. RING-DOWELL, SBN 278289 Telephone: (415) 817-1470 10 kringdowell@gibsondunn.com 555 Mission Street, Suite 3000 Attorneys for Plaintiffs 11 San Francisco, CA 94105-0921 DOUGLAS O'CONNOR, THOMAS COLOPY, Telephone: 415.393.8200 MATTHEW MANAHAN, and ELIE 12 Facsimile: 415.393.8306 **GURFINKEL** 13 Attorneys for Defendant 14 UBER TECHNOLOGIES, INC. 15 UNITED STATES DISTRICT COURT 16 NORTHERN DISTRICT OF CALIFORNIA 17 CASE NO. 13-03826-EMC DOUGLAS O'CONNOR, THOMAS 18 COLOPY, MATTHEW MANAHAN, and STIPULATION AND [PROPOSED] ORDER ELIE GURFINKEL, individually and on 19 TO CONTINUE DEADLINE TO FILE behalf of all others similarly situated, JOINT PRETRIAL CONFERENCE 20 STATEMENT, PRETRIAL MATERIALS, Plaintiffs, AND EXPERT REPORTS 21 V. 22 UBER TECHNOLOGIES, INC., 23 Defendant. 24 25 26 27 28

## **STIPULATION**

Pursuant to Civil Local Rule 7-12, Plaintiffs Douglas O'Connor, Thomas Colopy, Matthew Manahan, and Elie Gurfinkel ("Plaintiffs") and Defendant Uber Technologies, Inc. ("Uber") (collectively, the "Parties"), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on November 5, 2015, the Court ordered that trial in the above-captioned matter shall commence on June 20, 2016, *see* Dkt. 378;

WHEREAS, on November 5, 2015, the Court ordered that the Parties submit a joint pretrial conference statement and pretrial materials at least twenty-one days prior to the final pretrial conference, and the present deadline to file the joint pretrial conference statement and pretrial materials is May 3, 2016, *see* Dkt. 378;

WHEREAS, on January 5, 2016, the Court ordered that the Parties submit expert reports 30 days after the opt-out deadline, and the present deadline to file opening expert reports is April 28, 2016, *see* Dkt. 447;

WHEREAS, on January 5, 2016, the Court ordered that the Parties submit rebuttal expert reports 14 days after the submission of opening expert reports, and the present deadline to file rebuttal expert reports is May 12, 2016, *see* Dkt. 447;

WHEREAS, the Parties are continuing in good faith to meet and confer on various issues related to the joint pretrial conference statement, pretrial materials, and issues related to expert reports;

NOW THEREFORE, the Parties hereby stipulate, subject to the approval of this Court, that the joint pretrial conference statement and pretrial materials shall be due on May 10, 2016, expert opening reports shall be due on May 5, 2016, and expert rebuttal reports shall be due on May 19, 2016.

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1	IT IS SO STIPULATED	
2	Dated: March 24, 2016	GIBSON, DUNN & CRUTCHER LLP
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4		By:/s/ Dhananjay S. Manthripragada
5		By: /s/ Dhananjay S. Manthripragada Dhananjay S. Manthripragada
6		Attorneys for Defendant UBER TECHNOLOGIES, INC.
7		
8 9	Dated: March 24, 2016	LICHTEN & LISS-RIORDAN, P.C.
10		
11		By: /s/ Shannon Liss-Riordan Shannon Liss-Riordan
12		Attorney for Plaintiffs DOUGLAS O'CONNOR,
13		THOMAS COLOPY, MATTHEW MANAHAN, and ELIE GURFINKEL
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15		
16	(P	ROPOSED] ORDER
17	PURSUANT TO STIPULATIO	(ag modified above)
18	TORSOMIT TO STIT CENTRO	
19		STATES DISTRICT CO.
20	March 31 Dated:, 2016	
21		ORDENEE
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23		Judge Edward M. Chen
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25		PRINTERICT OF CE
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