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 HAKAN YUCESOY, ABDI MAHAMMED,
 MOKHTAR TALHA, BRIAN MORRIS, and
 PEDRO SANCHEZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DOUGLAS O'CONNOR, et al., individually
 and on behalf of all others similarly situated,
 Plaintiffs,

v.

UBER TECHNOLOGIES, INC.,
 Defendant.

HAKAN YUCESOY, et al., individually and
 on behalf of all others similarly situated,
 Plaintiffs,

v.

UBER TECHNOLOGIES, INC., et al.
 Defendants.

CASE NO. 13-cv-03826-EMC
 CASE NO. 15-cv-00262-EMC

**JOINT REQUEST TO VACATE
 DEADLINES**

~~[PROPOSED]~~ ORDER FILED
 CONCURRENTLY HEREWITH

(Modified)

1 **To the Court, the Parties, and their Attorneys of Record**

2 *O'Connor* Plaintiffs Douglas O'Connor, Thomas Colopy, Matthew Manahan, and Elie
3 Gurfinkel, individually and on behalf of all others similarly situated, *Yucesoy* Plaintiffs Hakan
4 Yucesoy, Abdi Mahammed, Mokhtar Talha, Brian Morris, and Pedro Sanchez, individually and on
5 behalf of all others similarly situated (collectively, "Plaintiffs"), and Defendants Uber Technologies,
6 Inc. ("Uber") and Travis Kalanick (as to *Yucesoy* only) (collectively, "Defendants"), by and through
7 their respective counsel of record, hereby submit the following Joint Request to Vacate Deadlines.

8 Plaintiffs and Defendants have simultaneously filed a motion for preliminary settlement
9 approval, and they respectfully request that the Court vacate all case management and trial deadlines
10 (set by orders docketed at *O'Connor* ECF Nos. 378, 447, 489, 500, and 504, and *Yucesoy* ECF No.
11 199).

12 Alternatively, the parties request that the Court continue all case management and trial
13 deadlines (set by orders docketed at *O'Connor* ECF Nos. 378, 447, 489, 500, and 504, and *Yucesoy*
14 ECF No. 199) by ninety (90) days and set a Status Conference for June 2, 2016.

15 The parties thank the Court and its staff for its cooperation in extending deadlines in this
16 litigation, which extensions were crucial to the parties reaching a settlement in this complex matter.

17
18 Respectfully submitted,

19 Dated: April 21, 2016

GIBSON, DUNN & CRUTCHER LLP

21 /s/ Dhananjay S. Manthripragada
22 Dhananjay S. Manthripragada
23 Attorneys for Defendants

24 Dated: April 21, 2016

LICHTEN & LISS-RIORDAN, P.C.

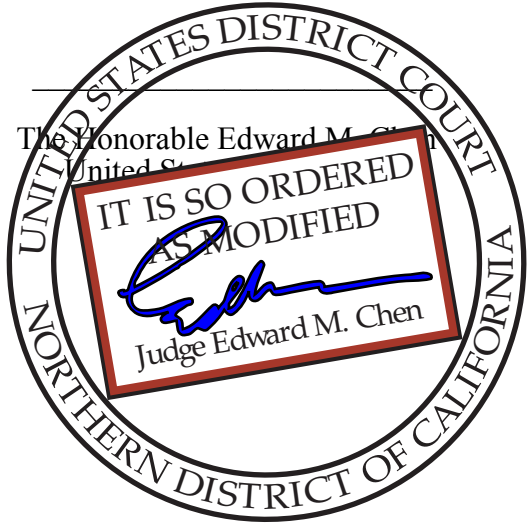
26 /s/ Shannon Liss-Riordan
27 Shannon Liss-Riordan, *pro hac vice*
28 Attorneys for Plaintiffs

1 **[~~PROPOSED~~] ORDER**

2 **PURSUANT TO JOINT REQUEST, IT IS SO ORDERED.**

3 All case management and trial deadlines are continued by 90 days. A status conference is
4 set for 6/2/16 at 1:30 p.m. Precise dates to be set at the 6/2/16 status conference.

5 Dated: May 2, 2016



ECF ATTESTATION

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/s/) within this e-filed document.

Dated: April 21, 2016

GIBSON DUNN & CRUTCHER, LLP

By /s/ Kevin J. Ring-Dowell
Kevin J. Ring-Dowell
Attorneys for Defendants

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