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13 Attorneys for Defendant  
 14 LYFT, INC.

15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA

17 PATRICK COTTER and ALEJANDRA  
 18 MACIEL, on behalf of themselves and all  
 19 others similarly situated,

20 Plaintiffs,

21 v.

22 LYFT, INC.,

23 Defendant.

Case No. 3:13-cv-04065-VC

**STIPULATION AND [PROPOSED]  
 ORDER REGARDING CLASS  
 CERTIFICATION BRIEFING SCHEDULE**

Judge: Hon. Vince Chhabria

Date Filed: September 3, 2013

Trial Date: None Set

1 The undersigned parties, by and through their respective counsel, do hereby stipulate<sup>1</sup>:  
2 WHEREAS, on April 9, 2015, the Court issued the Amended Case Management Order  
3 (Dkt. 110) requiring all discovery relating to class certification to be completed by no later than  
4 September 24, 2015;

5 WHEREAS, the Court set the hearing for plaintiffs' anticipated motion for class  
6 certification for December 17, 2015 at 10:00 a.m.;

7 WHEREAS, the Court ordered the parties to confer and submit a stipulated proposed  
8 briefing schedule in which the plaintiffs' reply brief is filed no later than two weeks before the  
9 hearing;

10 WHEREAS, the parties have met and conferred and jointly request that the Court enter the  
11 following order:

12 Plaintiffs shall file their Motion for Class Certification on October 8, 2015;  
13 Defendant shall file its Opposition to the Motion for Class Certification on November 17,  
14 2015; and  
15 Plaintiffs shall file their Reply in Support of the Motion for Class Certification on  
16 December 3, 2015.

17 **IT IS SO STIPULATED.**

18 Dated: June 12, 2015

KEKER & VAN NEST LLP

19  
20 By: /s/ Michelle Ybarra  
21 RACHAEL E. MENY  
22 R. JAMES SLAUGHTER  
23 MICHELLE YBARRA  
24 ALEXANDER DRYER  
25 Attorneys for Defendant  
LYFT, INC.

26 <sup>1</sup> As discussed at the hearing held on June 4, 2015, Plaintiffs may renew their request for an  
27 accelerated hearing and briefing schedule on their motion for class certification if the *Price v. Lyft*  
28 case is not stayed by the state court. Plaintiffs have agreed to this schedule on the assumption that  
the hearing on Plaintiffs' motion for class certification in this case will remain December 17,  
2015.

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Dated: June 12, 2015

OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P.C.

By: /s/ Thomas M. McInerney  
THOMAS M. MCINERNEY  
CHRISTOPHER M. AHEARN

Attorneys for Defendant  
LYFT, INC.

Dated: June 12, 2015

LICHTEN & LISS-RIORDAN, P.C.

By: /s/ Shannon Liss-Riordan  
SHANNON LISS-RIORDAN

Attorneys for Plaintiffs  
PATRICK COTTER and ALEJANDRA  
MACIEL, on behalf of themselves and all  
others similarly situated

Dated: June 12, 2015

CARLSON LEGAL SERVICES

By: /s/ Matthew D. Carlson  
MATTHEW D. CARLSON

Attorneys for Plaintiffs  
PATRICK COTTER and ALEJANDRA  
MACIEL, on behalf of themselves and all  
others similarly situated

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: June 16, 2015

  
HONORABLE VINCE CHHABRIA  
United States District Judge