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Counsel listed on following page.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PATRICK COTTER, ALEJANDRA
MACIEL, and JEFFREY KNUDTSON, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

LYFT, INC.,

Defendant.

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

Hon. Vince Chhabria

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING CLASS
CERTIFICATION DISCOVERY CUTOFF
AND CLASS CERTIFICATION
BRIEFING SCHEDULE**

Date Filed: September 3, 2013

Trial Date: None Set

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Attorneys for Defendant LYFT, INC.

1 The undersigned parties, by and through their respective counsel, do hereby stipulate:
2 WHEREAS, pursuant to the Court's Amended Case Management Order (Dkt. No. 110),
3 the current deadline for completing discovery related to class certification is September 24, 2015;

4 WHEREAS, pursuant to the parties' stipulation and subsequent Court Order (Dkt. No.
5 136), Plaintiffs are to file their Motion for Class Certification on October 8, 2015, Defendant is to
6 file its Opposition thereto on November 17, 2015, and Plaintiffs are to file their Reply on
7 December 3, 2015;

8 WHEREAS, the parties have engaged in two settlement conferences to date and are
9 scheduled to engage in their third settlement conference on October 13, 2015, five days after
10 Plaintiffs are currently scheduled to file their Motion for Class Certification (Dkt. No. 150);

11 WHEREAS, the parties agree that it would be beneficial to focus their time and resources
12 on this settlement conference;

13 WHEREAS, Defendant requires substantial additional time to supplement its previous
14 production of documents in response to Plaintiffs' Requests for Production of Documents in
15 advance of the deposition(s) of Defendant's Fed. R. Civ. P. 30(b)(6) designee(s);

16 WHEREAS, Plaintiffs require that Defendant complete its supplemental document
17 production in advance of taking Defendant's deposition(s) and in advance of filing their Motion
18 for Class Certification;

19 IT IS HEREBY STIPULATED, by and between Plaintiffs and Defendant, by and through
20 their respective counsel, that:

- 21 1. The deadline to complete discovery related to class certification shall be Friday,
22 November 20, 2015.
- 23 2. Plaintiffs shall file their Motion for Class Certification on Tuesday, December 8,
24 2015.
- 25 3. Defendant shall file their Opposition to Plaintiffs' Motion for Class Certification
26 on Tuesday, January 19, 2016.
- 27 4. Plaintiffs shall file their Reply in Support of their Motion for Class Certification
28 on Tuesday, February 9, 2016.

1 5. A hearing on Plaintiffs' Motion for Class Certification shall be held on Thursday,
2 February 25, 2016.

3
4 **IT IS SO STIPULATED.**

5
6 Dated: August 14, 2015

KEKER & VAN NEST LLP

7 By: /s/ R. James Slaughter

8 RACHAEL E. MENY
9 R. JAMES SLAUGHTER
10 MICHELLE YBARRA
11 ALEXANDER DRYER

Attorneys for Defendant LYFT, INC.

12
13 Dated: August 14, 2015

LICHTEN & LISS-RIORDAN, P.C.

14
15 By: /s/ Shannon Liss-Riordan

16 SHANNON LISS-RIORDAN

17 Attorneys for Plaintiffs
18 PATRICK COTTER, ALEJANDRA
19 MACIEL, and JEFFREY KNUDTSON, on
20 behalf of themselves and all others similarly
21 situated

22
23 Dated: August 14, 2015

CARLSON LEGAL SERVICES

24 By: /s/ Matthew D. Carlson

25 MATTHEW D. CARLSON

26 Attorneys for Plaintiffs
27 PATRICK COTTER, ALEJANDRA
28 MACIEL, and JEFFREY KNUDTSON, on
behalf of themselves and all others similarly
situated

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 17, 2015



HONORABLE VINCE CHHABRIA
United States District Judge