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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 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 Order Regarding Class Certification Discovery
3 Cutoff and Class Certification Briefing Schedule (Dkt. No. 155), the current deadline for
4 Plaintiffs to file their motion for class certification is December 8, 2015, the current deadline for
5 Defendant to file its opposition thereto is January 19, 2016, the current deadline for Plaintiffs to
6 file their reply to Defendant's opposition is February 9, 2016, and a hearing on Plaintiffs' motion
7 is scheduled for February 25, 2016;

8 WHEREAS, the parties have continued to engage in discovery necessary to move for and
9 oppose class certification; and

10 WHEREAS, nevertheless, the parties require additional time to prepare their submissions;

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

- 13 1. Plaintiffs shall file their Motion for Class Certification no later than January 19,
14 2016.
- 15 2. Defendant shall file their Opposition to Plaintiffs' Motion for Class Certification
16 no later than March 1, 2016 .
- 17 3. Plaintiffs shall file their Reply in Support of their Motion for Class Certification
18 no later than March 22, 2016.
- 19 4. A hearing on Plaintiffs' Motion for Class Certification shall be held on Thursday,
20 April 7, 2016, or as soon thereafter as may be convenient for the Court.

21 **IT IS SO STIPULATED.**

22 Dated: December 7, 2015

KEKER & VAN NEST LLP

23
24 By: /s/ R. James Slaughter
25 RACHAEL E. MENY
26 R. JAMES SLAUGHTER
27 MICHELLE YBARRA
28 ALEXANDER DRYER

Attorneys for Defendant LYFT, INC.

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Dated: December 7, 2015

LICHTEN & LISS-RIORDAN, P.C.

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

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

Dated: December 7, 2015

CARLSON LEGAL SERVICES

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

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

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 10, 2015



HONORABLE VINCE CHHABRIA
United States District Judge