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

17 CAREN EHRET,
 18 Plaintiff,
 19 v.
 20 UBER TECHNOLOGIES, Inc.,
 21 Defendant.

Case No. 3:14-cv-00113-EMC
**[PROPOSED] STIPULATION AND
 ORDER**
 Judge: Edward M. Chen

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1 Pursuant to the Court's Order of November 26, 2014, Defendant Uber Technologies, Inc.
2 ("Uber") and Plaintiff Caren Ehret ("Plaintiff"), by and through their attorneys of record, stipulate
3 as follows:

- 4 1. The deadline for Uber's production of emails and other ESI from additional
5 custodians Travis Kalanick, Ryan Graves and Andrew Macdonald shall be January
6 23, 2015.
- 7 2. The deadline for Plaintiff's filing of a motion for class certification shall be
8 extended to March 12, 2015. The deadline for Uber's filing of its opposition to
9 Plaintiff's motion for class certification shall be extended to April 16, 2015, and the
10 deadline for Plaintiff's reply shall be extended to May 14, 2015.

11 Uber enters this stipulation without prejudice to Uber's right to object to Judge Ryu's
12 November 26, 2014 order regarding custodians and date ranges and the timeline for production,
13 and reserves its right to file an objection to the order with Judge Chen. Plaintiff reserves her right
14 to oppose such an objection.

15 DATED: December 9, 2014

16 By /s/ Stephen A. Swedlow
17 Stephen A. Swedlow
18 Quinn Emanuel Urquhart & Sullivan, LLP
Attorney for Uber Technologies, Inc.

19 DATED: December 9, 2014

20 By /s/ Hall Adams¹
21 Hall Adams
22 Law Offices of Hall Adams LLC
23 Attorneys for Plaintiff

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¹ I, Stephen A. Swedlow, certify that Hall Adams concurs in the filing of this document.

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ORDER

GOOD CAUSE APPEARING, the Court hereby approves this Stipulation.

IT IS SO ORDERED. The hearing on the class certification motion is set for 6/4/15 at 1:30 p.m. CMC is reset

Dated: 12/10/14 from 4/23/15 to 6/4/15 at 1:30 p.m. An updated joint CMC ~~statement due 5/28/15.~~

Judge Edward M. Chen

