

1 Myron M. Cherry (California State Bar No. 50278)
 2 mcherry@cherry-law.com
 3 MYRON M. CHERRY & ASSOCIATES LLC
 30 North LaSalle Street, Suite 2300
 4 Chicago, Illinois 60602
 Telephone: (312) 372-2100
 Facsimile: (312) 853-0279

5 Hall Adams (admitted *pro hac vice*)
 6 hall@adamslegal.net
 LAW OFFICES OF HALL ADAMS, LLC
 33 North Dearborn Street, Suite 2350
 7 Chicago, Illinois 60602
 Telephone: (312) 445-4900
 8 Facsimile: (312) 445-4901

9 Michael F. Ram (SBN 104805)
 10 mram@rocklawcal.com
 Karl Olson (SBN 104760)
 11 kolson@rocklawcal.com
 RAM, OLSON, CEREGHINO & KOPCZYNSKI LLP
 555 Montgomery Street, Suite 820
 12 San Francisco, CA 94111
 Tel: 415-433-4949
 13 Fax: 415-433-7311

14 *Attorneys for Plaintiff and the Class*

15 **UNITED STATES DISTRICT COURT**
 16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

17 CAREN EHRET, individually and on behalf
 of a class of similarly situated persons,
 18
 Plaintiff,
 19
 v.
 20
 21 UBER TECHNOLOGIES, INC., a Delaware
 Corporation.
 22
 Defendant.

Case No. 3:14-cv-113-EMC

STIPULATION AND ~~[PROPOSED]~~
ORDER RE CLASS CERTIFICATION
BRIEFING SCHEDULE

24 Plaintiff Caren Ehret (“Plaintiff”) and Defendant Uber Technologies, Inc. (“Defendant” or
 25 “Uber”) (collectively, the “Parties”), by and through their attorneys of record, STIPULATE AS
 26 FOLLOWS:

27 The current deadline for Plaintiff’s filing of a motion for class certification is April 16,
 28 2015. The current deadline for Defendant’s filing of its opposition to Plaintiff’s motion for class

1 certification is May 21, 2015, and the current deadline for Plaintiff's reply is June 18, 2015. The
2 current deadline for the parties to file a case management statement is July 2, 2015. A case
3 management conference and hearing on Plaintiff's motion for class certification is currently
4 scheduled for July 9, 2015.

5 Due to the trial schedule of Defendant's counsel, the parties have had to reschedule the
6 mediation in this case. It is now set for June 29, 2015 with Martin Quinn. In the light of their
7 intention to attempt to mediate this matter and in an effort to conserve the Court's and the parties'
8 resources, the parties respectfully request that the Court order as follows:

9 The deadline for Plaintiff's filing of a motion for class certification shall be extended to
10 July 16, 2015. The deadline for Defendant's filing of its opposition to Plaintiff's motion for class
11 certification shall be extended to August 20, 2015. The deadline for Plaintiff's reply shall be
12 extended to September 17, 2015. This is the third extension of the class certification deadlines.

13 The deadline for the parties to file a case management statement shall be extended to
14 October 1, 2015. The case management conference and hearing on Plaintiff's motion for class
15 certification shall be rescheduled for October 8, 2015 at 1:30 p.m.

16 **IT IS SO STIPULATED.**

17 Dated: March 27, 2015

/s/ Arthur M. Roberts

Arthur M. Roberts (SBN 275272)
arthurroberts@quinnemanuel.com
QUINN, EMANUEL, URQUHART
& SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6327
Attorneys for Defendant

22 Dated: March 27, 2015

/s/ Michael F. Ram

Michael F. Ram (SBN 104805)
mram@rocklawcal.com
RAM, OLSON, CEREGHINO
& KOPCZYNSKI LLP
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: (415) 433-4949
Facsimile: (415) 433-7311
Attorneys for Plaintiff and the Class

27 ***Filers Attestation: Pursuant to Civil L.R. 5-1(i)(3)*
28 *regarding signatures, Michael F. Ram hereby attests*
that concurrence in the filing of this document has
been obtained from each Signatory.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

GOOD CAUSE APPEARING, the Court hereby approves this Stipulation.
IT IS SO ORDERED.

Dated: 3/30/15

The Hon. Edward M. Chen
Judge, Northern District of California

