

1 GOLDSTEIN, BORGAN, DARDARIAN & HO  
Laura L. Ho (SBN 173179)  
2 lho@gbdhlegal.com  
Andrew P. Lee (SBN 245903)  
3 alee@gbdhlegal.com  
William C. Jhaveri-Weeks (SBN 289984)  
4 wjhaveriweeks@gbdhlegal.com  
300 Lakeside Drive, Suite 1000  
5 Oakland, CA 94612  
Tel: (510) 763-9800  
6 Fax: (510) 835-1417

7 AHDOOT & WOLFSON, PC  
Tina Wolfson (SBN 174806)  
8 twolfson@ahdootwolfson.com  
Robert Ahdoot (SBN 172098)  
9 rahdoot@ahdootwolfson.com  
Theodore W. Maya (SBN 223242)  
10 tmaya@ahdootwolfson.com  
Bradley K. King (SBN 274399)  
11 bking@ahdootwolfson.com  
1016 Palm Avenue  
12 West Hollywood, CA 90069  
Tel: (310) 474-9111  
13 Fax: (310) 474-8585

14 LAWYERS' COMMITTEE FOR CIVIL RIGHTS  
OF THE SAN FRANCISCO BAY AREA  
15 Meredith Desautels (SBN 259725)  
mdesautels@lccr.com  
16 Dana Isaac Quinn (SBN 278848)  
disaac@lccr.com  
17 131 Steuart Street, Suite 400  
San Francisco, CA 94105  
18 Tel: (415) 543-9444  
Fax: (415) 543-0296

19 Attorneys for Plaintiffs and the Putative Classes  
20 *[Additional Counsel Listed on Following Page]*

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

23 IN RE UBER FCRA LITIGATION

CASE NO. 14-cv-05200-EMC

24 **JOINT STIPULATION TO VACATE CMC**  
25 **AND VACATE OR EXTEND DEADLINE TO**  
26 **RESPOND TO AMENDED**  
27 **CONSOLIDATED COMPLAINT**

28 ~~PROPOSED~~ ORDER FILED  
CONCURRENTLY HEREWITH

1 GIBSON, DUNN & CRUTCHER LLP  
THEODORE J. BOUTROUS, JR., SBN 132099

2 tboutrous@gibsondunn.com

3 THEANE EVANGELIS, SBN 243570

4 tevangelis@gibsondunn.com

5 DHANANJAY MANTHRIPRAGADA,  
SBN 254433

6 dmanthripragada@gibsondunn.com

7 333 South Grand Avenue

8 Los Angeles, CA 90071-3197

9 Telephone: 213.229.7000

10 Facsimile: 213.229.7520

11 JOSHUA S. LIPSHUTZ, SBN 242557

12 jlipshutz@gibsondunn.com

13 KEVIN J. RING-DOWELL, SBN 278289

14 kringdowell@gibsondunn.com

15 555 Mission Street, Suite 3000

16 San Francisco, CA 94105-0921

17 Telephone: 415.393.8200

18 Facsimile: 415.393.8306

19 Attorneys for Defendants

20 Uber Technologies, Inc. and Rasier, LLC

21 JOHN C. FISH, Jr., Bar No. 160620

22 jfish@littler.com

23 ROD M. FLIEGEL, Bar No. 168289

24 rfliegel@littler.com

25 ANDREW M. SPURCHISE, Bar No. 245998

26 aspurchise@littler.com

27 LITTLER MENDELSON, P.C.

28 333 Bush Street, 34th Floor

San Francisco, CA 94104

Tel: 415.433.1940

Fax: 415.399.8490

Attorneys for Defendants

Uber Technologies, Inc. and Rasier, LLC

SEYFARTH SHAW LLP

PAMELA Q. DEVATA (admitted *pro hac vice*)

pdevata@seyfarth.com

131 South Dearborn Street, Suite 2400

Chicago, Illinois 60603

Telephone: (312) 460-5000

Facsimile: (312) 460-7000

SEYFARTH SHAW LLP

TIMOTHY L. HIX (SBN 184372)

thix@seyfarth.com

333 S. Hope Street, Suite 3900

Los Angeles, California 90071

Telephone: (213) 270-9600

Facsimile: (213) 270-9601

Attorneys for Defendant

Hirease, LLC

1 **TO THE COURT, THE PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 Pursuant to Civil Local Rule 7-12, Plaintiffs Ronald Gillette, Abdul Mohamed, Shannon  
3 Wise, Brandon Farmer, and Meghan Christenson (collectively, “Plaintiffs”), Defendants Uber  
4 Technologies, Inc. and Rasier, LLC (together, “Uber”), and Defendant Hirease, LLC (“Hirease”)  
5 (together with Plaintiffs and Uber, the “Parties”), by and through their respective counsel of record,  
6 hereby stipulate as follows:

7 WHEREAS, on March 30, 2016, the Parties participated in mediation before a private  
8 mediator. While the mediation was productive, the parties were unable to reach resolution on March  
9 30, 2016, and scheduled a second day of mediation for May 2, 2016.

10 WHEREAS, on April 12, 2016, the Court granted a joint stipulation filed by the Parties,  
11 permitting Plaintiffs to file an Amended Consolidated Complaint and setting the deadline for Uber  
12 and Hirease to respond to the Complaint as “thirty (30) days after the amended consolidated  
13 complaint is filed or thirty (30) days after the second day of mediation occurs, whichever is later ....”  
14 ECF No. 170 at 3.

15 WHEREAS, on April 13, 2016, Plaintiffs filed an Amended Consolidated Complaint. *See*  
16 ECF No. 171.

17 WHEREAS, on May 2, 2016, the Parties participated in a second mediation session before a  
18 private mediator. The Parties were unable to reach a settlement-in-principle at that time; however,  
19 the mediation session was productive and settlement discussions continued after that session.

20 WHEREAS, on May 26, 2016, the Court granted a joint stipulation filed by the Parties setting  
21 June 22, 2016 as the deadline for Uber and Hirease to respond to the Amended Consolidated  
22 Complaint, in light of the “continuing resolution discussions” between the Parties. ECF No. 174.

23 WHEREAS, Plaintiffs filed a notice of settlement on June 15, 2016, advising the Court that  
24 Plaintiffs and Uber have reached a settlement-in-principle in this case, have “executed a  
25 Memorandum of Understanding (‘MOU’), and are in the process of preparing [a] final settlement  
26 agreement and related documentation.” ECF No. 178 at 1.

27 WHEREAS, Plaintiffs and Hirease continue to engage in good faith settlement negotiations in  
28 an effort to reach their own settlement.

1 WHEREAS, this is Defendants' third request to vacate or extend the time to respond to the  
2 Amended Consolidated Complaint.

3 WHEREAS, the Court previously scheduled a Case Management Conference for June 30,  
4 2016 (10:00 a.m.), and Civil Local Rule 16-10(d) therefore requires the Parties to file a Joint Case  
5 Management Statement on or before June 23, 2016.

6 WHEREAS, in light of the settlement-in-principle between Plaintiffs and Uber, as well as the  
7 ongoing resolution discussions between Plaintiffs and Hirease, the Parties believe that it would  
8 preserve the time and resources of both the Parties and the Court to vacate the Case Management  
9 Conference scheduled for June 30, 2016 and the accompanying Joint Case Management Statement  
10 filing deadline.

11 **NOW THEREFORE**, the Parties stipulate, subject to the approval of this Court, as follows:

12 1. In light of the settlement-in-principle between Uber and Plaintiffs, Uber's deadline to  
13 file a responsive pleading is hereby vacated, until and unless this Court denies Plaintiffs' forthcoming  
14 motion(s) for preliminary and/or final settlement approval. Should this Court deny Plaintiffs'  
15 motion(s) for preliminary and/or final settlement approval, Uber's responsive pleading deadline shall  
16 be thirty (30) days after the Court issues its order denying settlement approval.

17 2. Hirease's deadline to file a responsive pleading is hereby extended to July 6, 2016.

18 3. The Case Management Conference scheduled for June 30, 2016 (10:00 a.m.) is  
19 vacated. Therefore, the parties shall not be required to submit a Joint Case Management Statement  
20 on or before June 23, 2016.

21 Dated: June 22, 2016

Respectfully submitted,

22 GOLDSTEIN, BORGEN, DARDARIAN & HO  
23

24 Laura L. Ho

25 Laura L. Ho

26 Attorneys for Plaintiffs and the Putative Class  
27  
28

1 Dated: June 22, 2016

Respectfully submitted,

2 AHDOOT & WOLFSON, P.C.

3 Tina Wolfson

4 Tina Wolfson

5 Attorneys for Plaintiffs and the Putative Class

6 Dated: June 22, 2016

Respectfully submitted,

7 LITTLER MENDELSON, P.C.

8 Rod Fliegel

9 Rod M. Fliegel

10 Attorneys for Defendants Uber Technologies, Inc.  
11 and Rasier, LLC

12 Dated: June 22, 2016

Respectfully submitted,

13 GIBSON, DUNN & CRUTCHER LLP

14 Joshua Lipshutz

15 Joshua Lipshutz

16 Attorneys for Defendants Uber Technologies, Inc.  
17 and Rasier, LLC

18 Dated: June 22, 2016

Respectfully submitted,

19 SEYFARTH SHAW LLP

20 Timothy Hix

21 Timothy Hix

22 Attorneys for Defendant Hirease, LLC

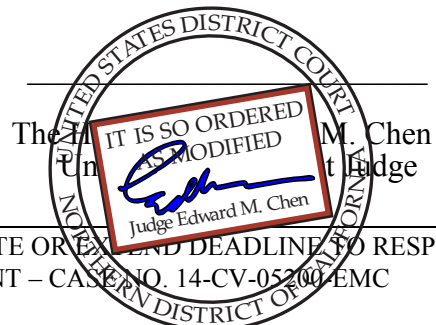
23 ~~[PROPOSED]~~ ORDER

24 **PURSUANT TO JOINT STIPULATION, IT IS SO ORDERED.** The Further CMC

25 is reset for 8/4/16 at 10:30 a.m. An updated joint CMC statement shall be filed  
26 by 7/28/16.

26 June 22

27 Dated: \_\_\_\_\_, 2016



1 **ECF ATTESTATION**

2 I hereby attest that I have on file all holographic signatures corresponding to any signatures  
3 indicated by a conformed signature (/s/) within this e-filed document.

4 Dated: June 22, 2016

GIBSON DUNN & CRUTCHER, LLP

5 By /s/ Kevin J. Ring-Dowell  
6 Kevin J. Ring-Dowell

7 Attorneys for Defendants Uber Technologies,  
8 Inc. and Rasier, LLC  
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