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 8 UBER TECHNOLOGIES, INC. AND RASIER,
 LLC

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

11 ABDUL KADIR MOHAMED,
 12 individually and on behalf of all others
 similarly-situated,
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 Plaintiff,
 14
 v.
 15 UBER TECHNOLOGIES, INC., RASIER,
 16 LLC, HIREASE, LLC and DOES 1-50,
 17
 Defendants.

Case No. 3:14-cv-05200-EMC

**STIPULATED REQUEST FOR ORDER
 CHANGING TIME AND
 CONSOLIDATING MOTION TO
 COMPEL ARBITRATION BRIEFING;
 [PROPOSED] ORDER GRANTING
 REQUEST FOR ORDER CHANGING
 TIME AND CONSOLIDATING MOTION
 TO COMPEL ARBITRATION BRIEFING**

Complaint Filed: November 24, 2014
 Trial Date: None set.

1 This Stipulation is entered into by and between Defendants Uber Technologies, Inc. and
2 Rasier, LLC¹ through their counsel of record Littler Mendelson, P.C., Plaintiff Abdul Kadir
3 Mohamed through his counsel of record Ahdoot & Wolfson, P.C and Plaintiff Ronald Gillette
4 (Plaintiff in the related action *Gillette v. Uber Technologies, Inc.*, Case No. 14-05241 EMC
5 [*“Gillette”*]) through his counsel of record Goldstein, Borgen, Dardarian & Ho (collectively “the
6 Parties”). Pursuant to Local Rule 6-2, the Parties hereby stipulate to a consolidated briefing
7 schedule regarding Defendants’ motions to compel arbitration in *Gillette* and the instant action
8 (*“Mohamed”*). The Parties also seek to continue the March 12, 2015 case management conference
9 date and associated deadlines.

10 This Stipulation is based on the following:

11 1. Defendant Uber Technologies, Inc. filed a motion to compel arbitration in the *Gillette*
12 action on January 23, 2015 and noticed the hearing for March 12, 2015. Plaintiff Gillette’s
13 opposition is currently due for filing on February 6, 2015.

14 2. Defendants Uber Technologies, Inc. and Rasier, LLC intend to file a motion to
15 compel arbitration in *Mohamed* on February 6, 2015.

16 3. The Court set a case management conference in *Gillette* for March 5, 2015, as well as
17 associated case management and ADR deadlines, as set forth in the Court’s Order Setting Initial
18 Case Management Conference and ADR Deadlines. The Court subsequently continued the case
19 management conference and associated deadlines to March 12, 2015.

20 4. The Court set a case management conference in *Mohamed* for February 26, 2015, as
21 well as associated case management and ADR deadlines, as set forth in the Court’s Order Setting
22 Initial Case Management Conference and ADR Deadlines. The Court subsequently continued the
23 case management conference and associated deadlines to March 12, 2015.

24 5. Given the overlap in legal and factual issues in the *Gillette* and *Mohamed* actions, the
25 Parties met and conferred regarding a consolidated briefing schedule regarding Defendants’ motions
26 to compel arbitration. The Parties believe that consolidated briefing, hearing, and initial case
27

28 ¹ Rasier, LLC is a defendant only in *Mohamed*.

1 management schedules promote efficiency and will avoid undue repetition of facts, evidence and
2 legal argument common to both actions. The Parties agree, however, that if consolidated briefs are
3 filed, the page limits for the consolidated opposition and reply should be enlarged to ensure
4 sufficient space to address factual and legal arguments specific to each Plaintiff.

5 6. This request is not made for purposes of unnecessary delay and no party will be
6 prejudiced by the granting of this request. Defendant Uber Technologies, Inc. and Plaintiff Gillette
7 previously stipulated to an extension of Defendant's time to file a responsive pleading. Defendants
8 Uber Technologies, Inc. and Rasier, LLC and Plaintiff Mohamed previously stipulated to two
9 extensions of Defendants' time to file a responsive pleading.

10 THEREFORE, the parties to this Stipulation hereby stipulate and request as follows:

11 1. The Court order a consolidated opposition, reply and hearing with respect to
12 Defendants' motions to compel arbitration in the *Gillette* and *Mohamed* matters.

13 2. The Court enlarge the consolidated opposition brief page limit to 40 pages and the
14 consolidated reply brief page limit to ²⁰~~25~~ pages.

15 3. The Court set the following consolidated briefing schedule for the motion to compel
16 arbitration previously filed in the *Gillette* action and the motion to compel arbitration anticipated to
17 be filed in the *Mohamed* action:

18

19 Plaintiffs' deadline to file Consolidated 20 Opposition to Defendants' Motions to 21 Compel Arbitration	March 5, 2015
22 Defendants' deadline to file Consolidated 23 Reply to Plaintiffs' Opposition	²⁰ March 23 , 2015
24 Motion to Compel Arbitration Hearing	April 9, 2015

25 4. The Court continue the March 12, 2015 case management conferences in the *Gillette*
26 and *Mohamed* actions to April 9, 2015, and that the Court continue all associated deadlines
27 accordingly.
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Dated: February 5, 2015

/s/ Andrew M. Spurchise
ANDREW M. SPURCHISE
LITTLER MENDELSON, P.C.
Attorneys for Defendant
UBER TECHNOLOGIES, INC. AND
RASIER, LLC

Dated: February 5, 2015

/s/ Tina Wolfson
TINA WOLFSON
AHDoot & WOLFSON, PC
Attorneys for Plaintiff ABDUL KADIR
MOHAMED

Dated: February 5, 2015

/s/ Andrew P. Lee
ANDREW P. LEE
GOLDSTEIN, BORGAN, DARDARIAN
& HO
Attorneys for Plaintiff in *Gillette v. Uber,
Technologies, Inc.*

SIGNATURE ATTESTATION

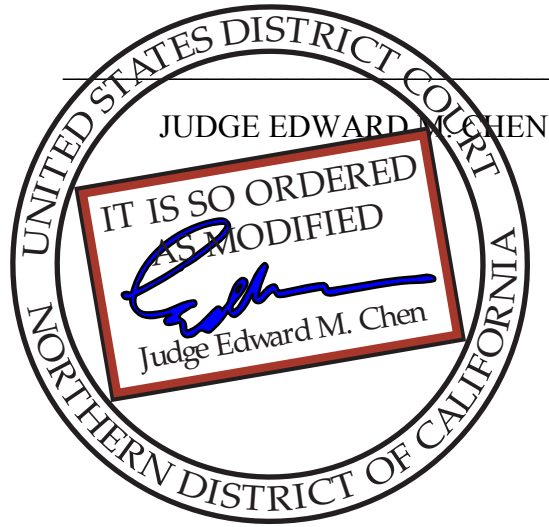
In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

DATED: February 5, 2015

/s/ Andrew M. Spurchise
ANDREW M. SPURCHISE

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PURSUANT TO STIPULATION, IT IS SO ORDERED, this ^{9th} _____ day of February 2015.



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