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8	Attorneys for Defendants UBER TECHNOLOGIES, INC. AND RASI	ER,
9	LLC	
10		
11	UNITED STATES DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA	
13	SAN FRANCISCO DIVISION	
14		
15	ABDUL KADIR MOHAMED, individually and on behalf of all others	Case No. 3:14-cv-05200-EMC Case No. 3:14-cv-05241-EMC
16	similarly-situated,	
17	Plaintiff,	STIPULATED REQUEST AND [PROPOSED] ORDER TO EXTEND DEFENDANTS' TIME TO FILE
18	V.	RESPONSIVE PLEADING
19	UBER TECHNOLOGIES, INC.; RASIER,	Complaint Filed: November 24, 2014
20	LLC; HIREASE, LLC; and DOES 1-50,	Trial Date: None set.
21	Defendants.	11.00.2 2000. 1 (01.0 200)
22	RONALD GILLETTE, individually and on behalf of all others similarly-situated,	
23	Plaintiff,	
24	V.	
25	UBER TECHNOLOGIES, INC., a	
26	California corporation, and DOES 1-20, inclusive,	
27 28	Defendants.	
∠8 ON, P.C. treet	STIPULATED REQUEST AND [PROPOSED] ORDER TO EXTEND DEFS' TIME TO FILE RESPONSIVE PLEADING	1. 3:14-cv-05200- 3:14-cv-05241-

RESPONSIVE PLEADING

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STIPULATED REQUEST AND [PROPOSED] LITTLER MENDELSON, P.C. 650 California Street
20th Floor
an Francisco, CA 94108.2693 ORDER TO EXTEND DEFS' TIME TO FILE RESPONSIVE PLEADING

Pursuant to Local Rule 6-2, Plaintiffs RONALD GILLETTE and ABDUL KADIR MOHAMED and Defendants UBER TECHNOLOGIES INC., RASIER, LLC and HIREASE, LLC (collectively, the "Parties") hereby stipulate to extend the deadline for Defendants to respond to the complaints until 14 days after the anticipated stipulated filing of Plaintiffs' consolidated complaint, or if the Parties are unable to agree on a stipulation for the filing of same, until 7 days after the Court rules on Plaintiffs' motion for leave to file a consolidated complaint. This Stipulation is based on the following:

- 1. The current deadline for Defendants to respond to the operative complaints in Mohamed v. Uber Technologies, Inc., et al. and Gillette v. Uber Technologies, Inc., et al. is July 9, 2015.
- Plaintiffs previously indicated in the Joint Case Management Conference Statement (Mohamed Docket No. 56; Gillette Docket No. 34) that they would consider filing a consolidated complaint if the Court were to deny Defendants' motions to compel arbitration.
- 3. Plaintiffs have now requested that Defendants stipulate to the filing of a consolidated complaint. The Parties are currently meeting and conferring regarding whether consolidation is appropriate and, if so, the terms of a stipulation regarding consolidation and the filing of a consolidated complaint. The Parties expect to submit to the Court a stipulation regarding consolidation, if any, within 14 days.
- 4 This request is not made by the Parties for purposes of unnecessary delay and no party will be prejudiced by the granting of this request. Defendant Uber Technologies, Inc. and Plaintiff Gillette previously stipulated to an extension of Defendant's time to respond to the complaint. Defendants Uber Technologies, Inc. and Rasier, LLC and Plaintiff Mohamed previously stipulated to two extensions of Defendants' time to respond to the complaint. Defendant Hirease, LLC and Plaintiff Mohamed previously stipulated to one extension of Hirease's time to respond to the complaint.
- 5. Nothing stated in or implied by this Stipulation and Proposed Order is intended to or shall affect Plaintiffs' right, if any, to amend their complaints in accordance with Federal Rule of Civil Procedure 15.

2.

1	6. Nothing stated in or implied by this Stipulation and Proposed Order is intended to or
2	shall affect any of the Parties' rights, arguments or positions with regard to the Parties' dispute
3	concerning arbitration or any other rights of the Parties.
4	THEREFORE, the parties to this Stipulation hereby stipulate and respectfully request as
5	follows: that the Court extend the deadline for Defendants to respond to the complaints until 14 days
6	after the anticipated stipulated filing of Plaintiffs' consolidated complaint, or if the Parties are unable
7	to agree on a stipulation for the filing of same, until 7 days after the Court rules on Plaintiffs' motion
8	for leave to file a consolidated complaint.
9	D (1 1 1 0 2015
10	Dated: July 8, 2015
11	/n/ A. June M. Connelina
12	/s/ Andrew M. Spurchise Andrew M. Spurchise
13	LITTLER MENDELSON, P.C. Attorneys for Defendants Uber Technologies,
14	Inc. and Rasier, LLC
15	Dated: July 8, 2015
16	Buted. July 0, 2013
17	/s/Theodore Maya
18	Theodore Maya AHDOOT & WOLFSON, PC
19	Attorneys for Plaintiff Abdul Kadir Mohamed
20	Dated: July 8, 2015
21	
22	/s/Andrew P. Lee Andrew P. Lee
23	GOLDSTEIN, BORGEN, DARDARIAN & HO
24	Attorneys for Plaintiff Ronald Gillette
25	
26	
27	
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1	Dated: July 8, 2015
2	
3	/s/Mitchell J. Freedman Paul K. Schrieffer
4	Mitchell J. Freedman P.K. SCHRIEFFER LLP
5	Attorneys for Defendant Hirease, LLC
6	Dated: July 8, 2015
7	/s/Sarah K. Hamilton Sarah K. Hamilton
8	SEYFARTH SHAW LLP
9	Attorneys for Defendant Hirease, LLC
10	
11	
12	SIGNATURE ATTESTATION
13	In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
14	document has been obtained from the signatories on this e-filed document.
15	
16	Dated: July 8, 2015 <u>/s/ Andrew M. Spurchise</u> ANDREW M. SPURCHISE
17	ANDREW M. SPURCHISE
18	
19	PURSUANT TO STIPULATION, IT IS SO ORDERED:
20	TORSOMIT TO STILL OF THE OF THE STILL OF THE
21	Dated: 7/9 , 2015
22	Butcu:, 2013
23	E TRED
24	IT IS SO ORDERED EN
2526	
27	Judge Edward M. Chen
28	Firmwide:134541216.4 073208.1047
N, P.C.	STIPULATED REQUEST AND [PROPOSED] ORDER TO EXTEND DEFS' TIME TO FILE DESPONSIVE BY EADING 4. 3:14-cv-05200-EMC 3:14-cv-05241-EMC

LITILER MENDELSON, P.C.
650 California Street
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STIPULATED REQUEST A
ORDER TO EXTEND DEFS
RESPONSIVE PLEADING