

1 JOHN C. FISH, Jr., Bar No. 160620
 jfish@littler.com
 2 ROD M. FLIEGEL, Bar No. 168289
 rfliegel@littler.com
 3 ANDREW M. SPURCHISE, Bar No. 245998
 aspurchise@littler.com
 4 LITTLER MENDELSON, P.C.
 650 California Street
 5 20th Floor
 San Francisco, California 94108.2693
 6 Telephone: 415.433.1940
 Facsimile: 415.399.8490
 7

8 Attorneys for Defendants
 9 UBER TECHNOLOGIES, INC. AND RASIER,
 10 LLC

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
 16 similarly-situated,

17 Plaintiff,

18 v.

19 UBER TECHNOLOGIES, INC.; RASIER,
 20 LLC; HIREASE, LLC; and DOES 1-50,

21 Defendants.

22 RONALD GILLETTE, individually and on
 23 behalf of all others similarly-situated,

24 Plaintiff,

25 v.

26 UBER TECHNOLOGIES, INC., a
 California corporation, and DOES 1-20,
 27 inclusive,

28 Defendants.

Case No. 3:14-cv-05200-EMC
 Case No. 3:14-cv-05241-EMC

**STIPULATED REQUEST AND
 [PROPOSED] ORDER TO EXTEND
 DEFENDANTS' TIME TO FILE
 RESPONSIVE PLEADING**

Complaint Filed: November 24, 2014

Trial Date: None set.

STIPULATED REQUEST AND [PROPOSED]
 ORDER TO EXTEND DEFS' TIME TO FILE
 RESPONSIVE PLEADING

1.

3:14-cv-05200-EMC
 3:14-cv-05241-EMC

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

8 1. The current deadline for Defendants to respond to the operative complaints in
9 *Mohamed v. Uber Technologies, Inc., et al.* and *Gillette v. Uber Technologies, Inc., et al.* is July 9,
10 2015.

11 2. Plaintiffs previously indicated in the Joint Case Management Conference Statement
12 (*Mohamed* Docket No. 56; *Gillette* Docket No. 34) that they would consider filing a consolidated
13 complaint if the Court were to deny Defendants’ motions to compel arbitration.

14 3. Plaintiffs have now requested that Defendants stipulate to the filing of a consolidated
15 complaint. The Parties are currently meeting and conferring regarding whether consolidation is
16 appropriate and, if so, the terms of a stipulation regarding consolidation and the filing of a
17 consolidated complaint. The Parties expect to submit to the Court a stipulation regarding
18 consolidation, if any, within 14 days.

19 4. This request is not made by the Parties for purposes of unnecessary delay and no
20 party will be prejudiced by the granting of this request. Defendant Uber Technologies, Inc. and
21 Plaintiff Gillette previously stipulated to an extension of Defendant’s time to respond to the
22 complaint. Defendants Uber Technologies, Inc. and Rasier, LLC and Plaintiff Mohamed previously
23 stipulated to two extensions of Defendants’ time to respond to the complaint. Defendant Hirease,
24 LLC and Plaintiff Mohamed previously stipulated to one extension of Hirease’s time to respond to
25 the complaint.

26 5. Nothing stated in or implied by this Stipulation and Proposed Order is intended to or
27 shall affect Plaintiffs’ right, if any, to amend their complaints in accordance with Federal Rule of
28 Civil Procedure 15.

1 Dated: July 8, 2015

2

3

/s/Mitchell J. Freedman

Paul K. Schrieffer
Mitchell J. Freedman
P.K. SCHRIEFFER LLP
Attorneys for Defendant Hirease, LLC

4

5

6

Dated: July 8, 2015

7

/s/Sarah K. Hamilton

Sarah K. Hamilton
SEYFARTH SHAW LLP
Attorneys for Defendant Hirease, LLC

8

9

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 document has been obtained from the signatories on this e-filed document.

14

15

16

Dated: July 8, 2015

/s/ Andrew M. Spurchise

ANDREW M. SPURCHISE

17

18

19

20

PURSUANT TO STIPULATION, IT IS SO ORDERED:

21

Dated: 7/9, 2015

22

23

24

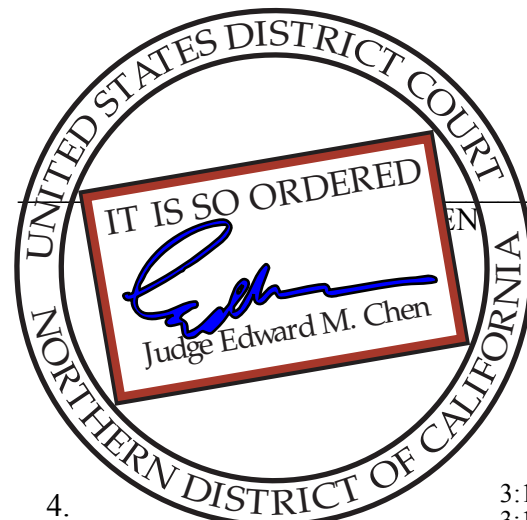
25

26

27

Firmwide:134541216.4 073208.1047

28



STIPULATED REQUEST AND [PROPOSED]
ORDER TO EXTEND DEFS' TIME TO FILE
RESPONSIVE PLEADING