JOHN C. FISH, Jr., Bar No. 160620
jfish@littler.com
ROD M. FLIEGEL, Bar No. 168289
rfliegel@littler.com
ANDREW M. SPURCHISE, Bar No. 245998
aspurchise@littler.com
LITTLER MENDELSON, P.C.
650 California Street, 20th Floor
San Francisco, CA 94108.2693
Telephone: 415.433.1940
Fax No.: 415.399.8490

Attorneys for Defendant
UBER TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

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

Plaintiff,

v.

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

Defendants.

Case No. 3:14-cv-05241 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

Trial Date: None set.
Complaint Filed: November 26, 2014
Amended Complaint Filed: December 15, 2014

This Stipulation is entered into by and between Defendants Uber Technologies, Inc. and Rasier, LLC[1] through their counsel of record Littler Mendelson, P.C., Plaintiff Ronald Gillette, through his counsel of record Goldstein, Borgen, Dardarian & Ho and Plaintiff Abdul Kadir Mohamed (Plaintiff in the related action *Mohamed v. Uber Technologies, Inc., et al.*, Case No. 14-05200-EMC ["*Mohamed*"]) through his counsel of record Ahdoot & Wolfson, P.C. (collectively "the Parties"). Pursuant to Local Rule 6-2, the Parties hereby stipulate to a consolidated briefing schedule regarding Defendants' motions to compel arbitration in *Mohamed* and the instant action ("*Gillette*"). The Parties also seek to continue the March 12, 2015 case management conference date and associated deadlines.

This Stipulation is based on the following:

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

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

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

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

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

[1] Rasier, LLC is a defendant only in the related action *Mohamed v. Uber Technologies, Inc., et al.*, Case No. 14-05200-EMC.

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

6. This request is not made 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 file a responsive pleading. Defendants Uber Technologies, Inc. and Rasier, LLC and Plaintiff Mohamed previously stipulated to two extensions of Defendants' time to file a responsive pleading.

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

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

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

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

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

4. The Court continue the March 12, 2015 case management conferences in the *Gillette* and *Mohamed* actions to April 9, 2015, and that the Court continue all associated deadlines accordingly.

Dated: February 5, 2015

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

Dated: February 5, 2015

/s/ *Andrew P. Lee*
ANDREW P. LEE
GOLDSTEIN, BORGEN, DARDARIAN & HO
Attorneys for Plaintiff
RONALD GILLETTE

Dated: February 5, 2015

/s/ *Tina Wolfson*
TINA WOLFSON
AHDOOT & WOLFSON, PC
Attorneys for Plaintiff in *Mohamed v. Uber, Technologies, Inc., et al.*

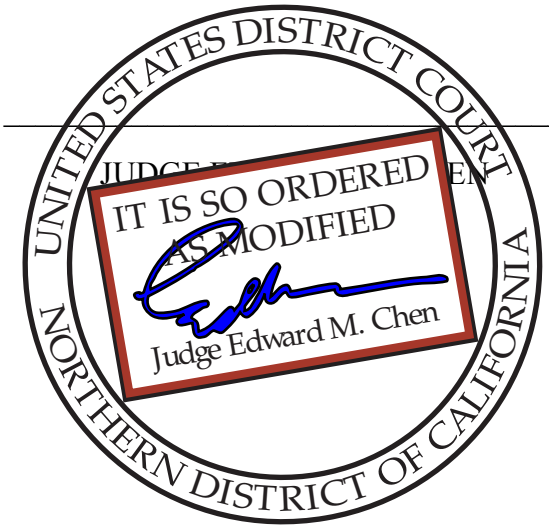
SIGNATURE ATTESTATION

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

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



Firmwide:130885982.1 073208.1047