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 LLC  
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 11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN FRANCISCO DIVISION  
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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  
 behalf of all others similarly-situated,

23 Plaintiff,

24 v.

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

27 Defendants.  
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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           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  
10 Dated: July 8, 2015

11  
12 /s/ Andrew M. Spurchise  
13 Andrew M. Spurchise  
14 LITTLER MENDELSON, P.C.  
Attorneys for Defendants Uber Technologies,  
Inc. and Rasier, LLC

15  
16 Dated: July 8, 2015

17  
18 /s/Theodore Maya  
19 Theodore Maya  
AHDoot & Wolfson, PC  
Attorneys for Plaintiff Abdul Kadir Mohamed

20  
21 Dated: July 8, 2015

22  
23 /s/Andrew P. Lee  
24 Andrew P. Lee  
25 GOLDSTEIN, BORGAN, DARDARIAN &  
26 HO  
27 Attorneys for Plaintiff Ronald Gillette

1 Dated: July 8, 2015

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3

/s/Mitchell J. Freedman

Paul K. Schrieffer

4 Mitchell J. Freedman

P.K. SCHRIEFFER LLP

5 Attorneys for Defendant Hirease, LLC

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Dated: July 8, 2015

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/s/Sarah K. Hamilton

Sarah K. Hamilton

8 SEYFARTH SHAW LLP

Attorneys for Defendant Hirease, LLC

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**SIGNATURE ATTESTATION**

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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.

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Dated: July 8, 2015

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/s/ Andrew M. Spurchise

ANDREW M. SPURCHISE

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PURSUANT TO STIPULATION, IT IS SO ORDERED:

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July 9

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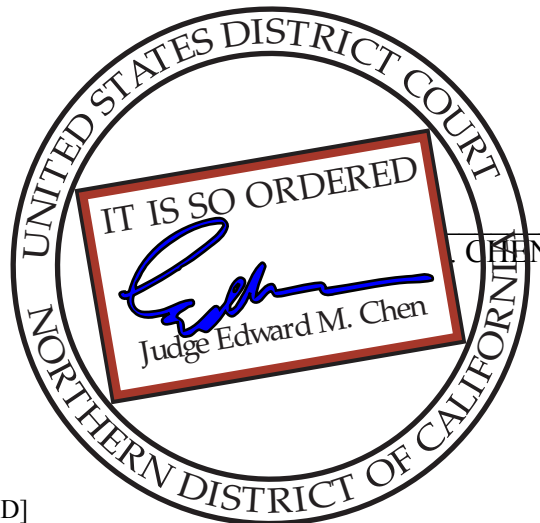
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STIPULATED REQUEST AND [PROPOSED]  
ORDER TO EXTEND DEFS' TIME TO FILE  
RESPONSIVE PLEADING