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23 *Attorneys for Defendant Uber Technologies, Inc.*

24 **IN THE UNITED STATES DISTRICT COURT**  
 25 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

26  
 27  
 28

1 PLAINTIFFS JAMES LATHROP, JULIE  
2 MCKINNEY, JONATHAN GRINDELL,  
3 SANDEEP PAL, JENNIFER REILLY, and  
4 JUSTIN BARTOLET on behalf of themselves  
and all others similarly situated,

5 Plaintiffs,

6 v.

7 UBER TECHNOLOGIES, INC.

8 Defendant.  
9

Civil Action No. 14-cv-05678-JST

**~~PROPOSED~~ ORDER RE: JOINT  
LETTER BRIEF ON DISCOVERY  
FILED DECEMBER 23, 2015**

The Honorable Jon S. Tigar

10  
11 **WHEREAS**, Plaintiffs James Lathrop, Julie McKinney, Jonathan Grindell, Sandeep  
12 Pal, Jennifer Reilly, and Justin Bartolet (“Plaintiffs”) and Defendant Uber Technologies, Inc.  
13 (“Defendant” or “Uber”) submitted a joint letter outlining the parties’ current discovery  
14 disputes (Docket No. 100);

15 **WHEREAS**, the parties disagree about whether the Court should require Uber to  
16 appear for at least two 7-hour Rule 30(b)(6) depositions;

17 **WHEREAS**, the Court heard argument from the parties on January 7, 2016, on the  
18 issues in the joint letter and ordered the Plaintiffs to submit a Proposed Order regarding the  
19 scheduling of a Rule 30(b)(6) deposition of Uber.

20 **IT IS HEREBY ORDERED** as follows:

- 21 1. Given the complexity and scope of this putative class action, Plaintiffs are entitled to  
22 more than one Fed. R. Civ. P. 30(b)(6) deposition of Uber in this case.  
23 2. Plaintiffs are permitted to take a Fed. R. Civ. P. 30(b)(6) deposition of Uber related to  
24 discovery issues. The deposition will take place on January 25, 2016.  
25 3. Plaintiffs are permitted to take at least one additional Fed. R. Civ. P. 30(b)(6)  
26 deposition of Uber related to substantive issues, to be conducted on a separate date(s).  
27 4. The Court hereby defers ruling on whether Uber must produce: (1) logs of text  
28 messages sent to putative class members; and (2) additional screen flows from its

1 mobile application and mobile and desktop websites. Should the parties' dispute as to  
2 these issues remain following the Fed. R. Civ. P. 30(b)(6) deposition of Uber related  
3 to discovery issues, the parties shall submit an additional letter brief outlining the  
4 remaining dispute to the Court within one week following the Rule 30(b)(6)  
5 deposition on discovery.

6 **IT IS SO ORDERED.**

7  
8 Dated: January 13, 2016



UNITED STATES DISTRICT JUDGE

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10  
11  
12 The above order is approved as to form  
13 only:

14 /s/ Debra R. Bernard (by consent)  
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*Attorneys for Defendant*

The above order is approved as to form and  
substance:

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**CERTIFICATE OF SERVICE**

The undersigned certifies that, on January 13, 2016, I caused the foregoing document to be filed electronically through the Court’s CM/ECF System and served on all counsel of record.

/s/ Hassan A. Zavareei  
Hassan A. Zavareei  
*Attorney for Plaintiffs*