

1 Hassan A. Zavareei (SBN 181547)  
 2 hzavareei@tzlegal.com  
 3 Andrea R. Gold (admitted *pro hac vice*)  
 4 agold@tzlegal.com  
 5 Andrew J. Silver (admitted *pro hac vice*)  
 6 asilver@tzlegal.com  
 7 **TYCKO & ZAVAREEI LLP**  
 8 1828 L Street, N.W., Suite 1000  
 9 Washington, DC 20036  
 10 Tel.: (202) 973-0900  
 11 Fax: (202) 973-0950

12 Kristen Law Sagafi (SBN 222249)  
 13 ksagafi@tzlegal.com  
 14 **TYCKO & ZAVAREEI LLP**  
 15 483 Ninth Street, Suite 200  
 16 Oakland, CA 94607  
 17 Tel.: (510) 907-7255  
 18 Fax: (202) 973-0950

19 *Attorneys for Plaintiffs James Lathrop,  
 20 Jonathan Grindell, Sandeep Pal,  
 21 Jennifer Reilly, and Justin Bartolet*

22 Sarah J. Crooks (admitted *pro hac vice*)  
 23 SCrooks@perkinscoie.com  
 24 **PERKINS COIE LLP**  
 25 1120 NW Couch Street, 10th Floor  
 26 Portland, OR 97209  
 27 Tel.: (503) 727-2252  
 28 Fax: (503) 346-2252

Debra R. Bernard (admitted *pro hac vice*)  
 dbernard@perkinscoie.com  
**PERKINS COIE LLP**  
 131 South Dearborn, Suite 1700  
 Chicago, Illinois 60603  
 Tel.: (312) 324-8559

*Attorneys for Defendant Uber Technologies, Inc.*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

JAMES LATHROP, JONATHAN  
 GRINDELL, SANDEEP PAL, JENNIFER  
 REILLY, and JUSTIN BARTOLET on  
 behalf of themselves and all others  
 similarly situated,  
 Plaintiffs,  
 v.  
 UBER TECHNOLOGIES, INC.,  
 Defendant.

Case No. 14-cv-05678-JST

Honorable Jon S. Tigar

**STIPULATION AND ~~PROPOSED~~  
 ORDER EXTENDING THE PAGE LIMIT  
 FOR THE PARTIES' JOINT LETTER  
 BRIEF**

1 Plaintiffs James Lathrop, Jonathan Grindell, Sandeep Pal, Jennifer Reilly, and Justin  
2 Bartolet (collectively, “Plaintiffs”) and Defendant Uber Technologies, Inc. (“Defendant”), by and  
3 through their respective attorneys of record, stipulate and agree as follows:

4 WHEREAS, on February 8, 2016, Plaintiffs and Defendant will submit a supplemental  
5 joint letter brief describing any remaining discovery disputes from the December 23, 2015 joint  
6 letter brief;

7 WHEREAS, the joint letter brief will address issues that are significant to the case, will  
8 involve highly technical information about whether generating certain information is  
9 technologically possible or feasible, and will incorporate deposition testimony, expert opinion,  
10 and documents that require explanation;

11 WHEREAS, this Court’s Civil Standing Order requires joint letter briefs to be five pages  
12 or less;

13 WHEREAS, the Parties agree that the Court would benefit from briefing that more  
14 comprehensively addresses the issues presented; and

15 WHEREAS, the Parties request a five-page enlargement of the Court’s page limitation for  
16 joint letter briefs.

17 **IT IS HEREBY STIPULATED THAT:**

18 The Parties agree, subject to Court approval, to submit the supplemental joint letter brief  
19 of ten pages or less that describes the remaining disputed discovery issues, where the  
20 aforementioned ten pages will be single-spaced using 12-point Times New Roman font and  
21 includes neither the caption, which will be provided in a separate cover sheet, nor the signatures  
22 of counsel, which will be provided on the eleventh page.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: February 2, 2016

**TYCKO & ZAVAREEI LLP**

By: /s/ Hassan A. Zavareei  
Hassan A. Zavareei, Bar No. 181547  
hzavareei@tzlegal.com

Attorney for Plaintiffs

DATED: February 2, 2016

**PERKINS COIE LLP**

By: /s/ Debra R. Bernard  
Debra R. Bernard (admitted *pro hac vice*)  
DBernard@perkinscoie.com

Attorney for Defendant

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: February 3, 2016



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**FILER'S ATTESTATION**

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all parties have concurred in the filing of this Stipulation.

DATED: February 2, 2016

**TYCKO & ZAVAREEI LLP**

By: /s/ Hassan A. Zavareei  
Hassan A. Zavareei

Attorney for Plaintiffs