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27 *Attorneys for Defendant Uber Technologies,  
 28 Inc.*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

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

Plaintiffs,

vs.

UBER TECHNOLOGIES, INC.,

Defendant.

Civil Action No.: 14-cv-05678-JST

Honorable Jon S. Tigar

**STIPULATION TO PARTICIPATE IN  
 PRIVATE MEDIATION PROCESS**

1 Plaintiffs JAMES LATHROP, JULIE MCKINNEY, JONATHAN GRINDELL, SANDEEP  
2 PAL, JENNIFER REILLY, and JUSTIN BARTOLET and Defendant UBER TECHNOLOGIES,  
3 INC. (collectively, “the Parties”) hereby submit, through the undersigned counsel of record, the  
4 following Stipulation to Participate in Private Mediation Process. In support of this stipulation, the  
5 Parties state as follows:

- 6 1. Plaintiffs filed their initial Complaint on December 31, 2014.
- 7 2. On March 13, 2015, the parties filed their Stipulation and Proposed Order Selecting  
8 ADR Process. *See* Docket No. 30. In that Stipulation, the parties agreed to participate in mediation  
9 using the Court’s process by November 30, 2015.
- 10 3. On April 29, 2015, the parties timely filed their Joint Case Management Statement.  
11 *See* Docket No. 37. In that Joint Case Management Statement, the parties agreed to conduct  
12 mediation by February 16, 2016.
- 13 4. On July 19, 2015, the Court granted in part and dismissed in part Defendant’s partial  
14 Motion to Dismiss. *See* Docket No. 49.
- 15 5. The parties have had further meet and confer discussions concerning mediation and  
16 have agreed that a private mediation is preferable to the Court process. Pending the Court’s  
17 approval, the parties have agreed to conduct a private mediation with a mediator agreeable to both  
18 parties. The parties do not currently have a private mediation scheduled, but will schedule such a  
19 mediation when they believe that it will be productive.

20 **IT IS THEREFORE STIPULATED AND AGREED** by the Parties, through the  
21 undersigned, as follows:

- 22 1. Provided that the Court approves, the Parties agree to participate in private mediation  
23 with a mediator to be jointly approved by the parties.
- 24 2. The Parties agree that the case should be removed from the Court’s mediation  
25 program.

26 **IT IS SO STIPULATED.**

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DATED: September 2, 2015

TYCKO AND ZAVAREEI, LLP

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

Attorneys for Plaintiffs

DATED: September 2, 2015

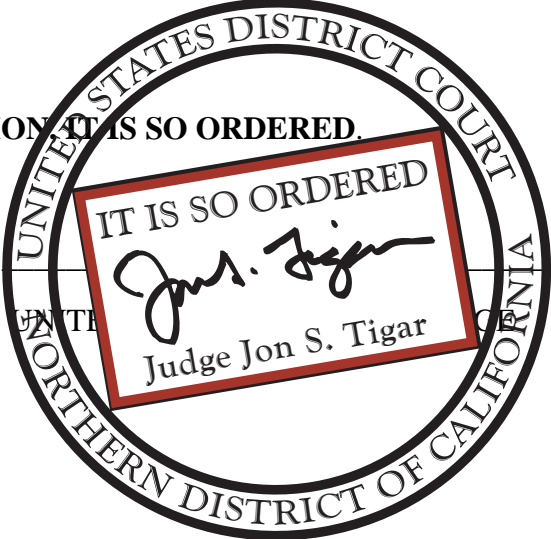
LOCKE LORD LLP

By /s/ Martin W. Jaszczuk  
Martin W. Jaszczuk

Attorneys for Defendant

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

DATED: September 2, 2015



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**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: September 2, 2015

TYCKO AND ZAVAREEI, LLP

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

Attorney for Plaintiffs