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 MOKHTAR TALHA, BRIAN MORRIS, and  
 PEDRO SANCHEZ

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

19 HAKAN YUCESOY, ABDI MAHAMMED,  
 20 MOKHTAR TALHA, BRIAN MORRIS, and  
 21 PEDRO SANCHEZ, individually and on  
 22 behalf of all others similarly situated,

23 Plaintiffs,

24 v.

25 UBER TECHNOLOGIES, INC. and TRAVIS  
 26 KALANICK,

27 Defendants.

CASE NO. 3:15-cv-00262-EMC

**STIPULATION AND ~~[PROPOSED]~~ ORDER  
 TO EXPEDITE DISCOVERY**

Date: November 24, 2015  
 Time: 1:30 p.m.  
 Place: Courtroom 5  
 Judge: Hon. Edward M. Chen

1 **STIPULATION**

2 Pursuant to Civil Local Rule 7-12, the undersigned counsel of record for Plaintiffs Hakan  
3 Yucesoy, Abdi Mahammed, Mokhtar Talha, Brian Morris, and Pedro Sanchez (“Plaintiffs”) and  
4 Defendants Uber Technologies, Inc. and Travis Kalanick (“Defendants”) (collectively, the “Parties”)  
5 stipulate and agree as follows:

6 WHEREAS, the Court granted the Parties’ stipulation that the deposition of Plaintiff Yucesoy  
7 shall take place on January 8, 2016, in San Francisco, CA, *see* Dkt. 126;

8 WHEREAS, the Court ordered the Parties to “meet and confer and to submit to the Court a  
9 stipulation regarding expedited discovery” in advance of Mr. Yucesoy’s deposition, *see* Dkt. 125 at 2;

10 WHEREAS, the pleadings may not be settled in advance of the January 8, 2016 deposition of  
11 Mr. Yucesoy;

12 WHEREAS, in order to complete “expedited discovery before Mr. Yucesoy’s deposition  
13 takes place” in light of the Court’s order that “Defendants shall depose Mr. Yucesoy on all issues”  
14 but that “Mr. Yucesoy may be subject to recall if reasonably necessary” (Dkt. 374), the Parties are  
15 agreed that (1) Defendants may propound discovery on Mr. Yucesoy on or before November 20,  
16 2015, based on the allegations in the Second Amended Complaint even though some of the claims in  
17 the Second Amended Complaint have been dismissed, and Plaintiffs will respond to any such  
18 discovery within fourteen days of service; and (2) Defendants may serve additional discovery on Mr.  
19 Yucesoy within seven days after Plaintiffs file their Third Amended Complaint, and Plaintiffs will  
20 respond to any such discovery within fourteen days of service.

21 IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s approval, that:

22 (1) Defendants may propound discovery on Mr. Yucesoy based on the allegations in the  
23 Second Amended Complaint by November 20, 2015, and Plaintiffs will respond to any such  
24 discovery within fourteen (14) days of service; and

25 (2) Defendants may propound additional discovery on Mr. Yucesoy within seven (7) days  
26 after Plaintiffs file their Third Amended Complaint, and Plaintiffs will respond to any such discovery  
27 within fourteen (14) days of service.

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**IT IS SO STIPULATED**

Dated: November 17, 2015

GIBSON, DUNN & CRUTCHER LLP

By:         /s/ Theane D. Evangelis          
Theane D. Evangelis

Attorneys for Defendants UBER  
TECHNOLOGIES, INC. and TRAVIS  
KALANICK

Dated: November 17, 2015

LICHTEN & LISS-RIORDAN, P.C.

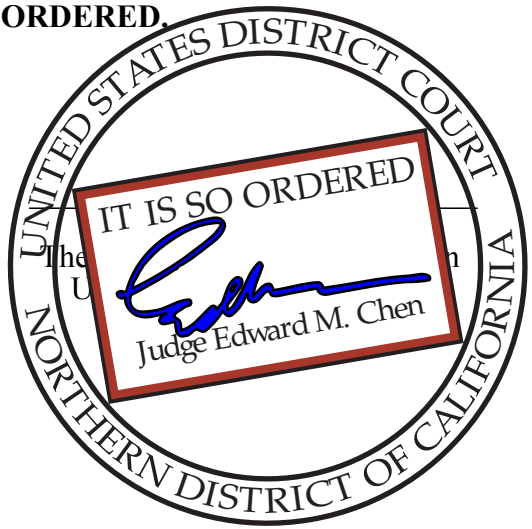
By:         /s/ Shannon Liss-Riordan          
Shannon Liss-Riordan

Attorney for Plaintiffs HAKAN YUCESOY, ABDI  
MAHAMMED, MOKHTAR TALHA, BRIAN  
MORRIS, and PEDRO SANCHEZ

~~PROPOSED~~ **ORDER**

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

Dated:         11/20        , 2015



**ECF ATTESTATION**

I, Dhananjay S. Manthripragada, hereby attest that concurrence in the filing of this document has been obtained from Theane D. Evangelis and Shannon Liss-Riordan.

By:           /s/ Dhananjay S. Manthripragada            
Dhananjay S. Manthripragada

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