1 GIBSON, DUNN & CRUTCHER LLP SHANNON LISS-RIORDAN, pro hac vice THEODORE J. BOUTROUS, JR., SBN (sliss@llrlaw.com) 2 132099 ADELAIDE PAGANO, pro hac vice (apagano@llrlaw.com) tboutrous@gibsondunn.com 3 DEBRA WONG YANG, SBN 123289 LICHTEN & LISS-RIORDAN, P.C. dwongyang@gibsondunn.com 729 Boylston Street, Suite 2000 4 MARCELLUS A. MCRAE, SBN 140308 Boston, MA 02116 5 mmcrae@gibsondunn.com Telephone: (617) 994-5800 THEANE D. EVANGELIS, SBN 243570 Facsimile: (617) 994-5801 6 tevangelis@gibsondunn.com DHANANJAY S. MANTHRIPRAGADA, MATTHEW CARLSON (SBN 273242) 7 SBN 254433 (mcarlson@carlsonlegalservices.com) CARLSON LEGAL SERVICES 8 dmanthripragada@gibsondunn.com 333 South Grand Avenue 100 Pine Street, Suite 1250 9 Los Angeles, CA 90071-3197 San Francisco, CA 94111 Telephone: 213.229.7000 Telephone: (415) 817-1470 10 Facsimile: 213.229.7520 Attorneys for Plaintiffs 11 GIBSON, DUNN & CRUTCHER LLP HAKAN YUCESOY and ABDI MAHAMMED 12 JOSHUA S. LIPSHUTZ, SBN 242557 ilipshutz@gibsondunn.com 13 KEVIN J. RING-DOWELL, SBN 278289 kringdowell@gibsondunn.com 14 555 Mission Street, Suite 3000 San Francisco, CA 94105-0921 15 Telephone: 415.393.8200 Facsimile: 415.393.8306 16 17 Attorneys for Defendants UBER TECHNOLOGIES, INC., TRAVIS 18 KALANICK, and RYAN GRAVES 19 UNITED STATES DISTRICT COURT 20 NORTHERN DISTRICT OF CALIFORNIA 21 HAKAN YUCESOY and ABDI CASE NO. 3:15-cv-00262-EMC 22 MAHAMMED, individually on behalf of all others similarly situated, JOINT STIPULATION AND [PROPOSED] 23 ORDER CHANGING TIME TO RESPOND Plaintiffs, 24 V. 25 UBER TECHNOLOGIES, INC., TRAVIS 26 KALANICK, and RYAN GRAVES, 27 Defendants. 28

## **STIPULATION**

Plaintiffs Hakan Yucesoy and Abdi Mahammed ("Plaintiffs") and Defendants Uber Technologies, Inc., Travis Kalanick, and Ryan Graves ("Defendants") (collectively, the "Parties"), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on March 31, 2015, Defendants filed a motion to dismiss Plaintiffs' First Amended Complaint, *see* Docket No. 36;

WHEREAS, on June 12, 2015, this Court issued an Order granting in part and denying in part Defendants' motion to dismiss Plaintiffs' First Amended Complaint, *see* Docket No. 69;

WHEREAS, by the same Order, this Court granted Plaintiffs leave to file a Second Amended Complaint on or before July 2, 2015, *see* Docket No. 69;

WHEREAS, the Parties have conferred and Plaintiffs have indicated that they intend to file a Second Amended Complaint;

WHEREAS, in the absence of an Order by this Court modifying the pleadings schedule, Defendants may be required to file a responsive pleading on or before June 26, 2015, in accordance with Fed. Rule Civ. Pro. 12(a)(4)(A)—a date before the deadline to file a Second Amended Complaint;

NOW THEREFORE, the Parties hereby stipulate, subject to the approval of this Court, to the following deadline:

• Defendants must file a responsive pleading no later than thirty (30) days from the date of filing of the Second Amended Complaint.

## IT IS SO STIPULATED

1	Dated: June 24, 2015	GIBSON, DUNN & CRUTCHER LLP
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3		By: /s/ Theodore J. Boutrous Jr. Theodore J. Boutrous Jr.
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5		Attorney for Defendants UBER TECHNOLOGIES, INC., TRAVIS KALANICK, and RYAN GRAVES
6	Dated: June 24, 2015	LICHTEN & LISS-RIORDAN, P.C.
7		
8		By: /s/ Shannon Liss-Riordan Shannon Liss-Riordan
9		Attorney for Plaintiffs HAKAN YUCESOY and
10		ABDI MAHAMMED
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12		
13		[PROPOSED] ORDER
14	DUDCHANT TO CTIDUI ATION	
15	PURSUANT TO STIPULATION	
16		STATES DISTRICT CO.
17	Dated:, 2015	
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20		Judge Edward M. Chen
21		
22		DISTRICTOR
23		DISTRICT OF
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2	ECF ATTESTATION
3	I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/s/) within this e-filed document.
	indicated by a comormed signature (75/) within this e-med document.
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5	D /2/
6	By:/ <sub>S</sub> / Dhananjay S. Manthripragada
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Gibson, Dunn & Crutcher LLP