1 2 3 4 5 6 7 8 9 10 11 12 13 14	85 Fifth Avenue New York, NY 10003 Tel.: (212) 257-6800 Fax: (212) 257-6845 ERIC F. YUHL (SBN 102051) COLIN A. YUHL (SBN 259196) YUHL CARR LLP 4676 Admiralty Way, Suite 550		
15	NORTHERN DISTRICT OF CALIFORNIA		
16	JANE DOE,	Case No.: 3:15-cv-00424(SI)	
17	Plaintiff,		
18	VS.		
19 20	UBER TECHNOLOGIES, INC.,		
20	Defendant.		
22			
23	STIPULATION AND PROPOSED ORDER		
24	It is hereby stipulated, by and between Plaintiff Jane Doe ("Plaintiff") and Defendant Uber		
25	Technologies, Inc., ("Uber U.S.") that:		
26	1. Uber U.S. consents to extending the time for Plaintiff to file an amended		
27 28	complaint pursuant to Fed. R. Civ. P. 15(a), from May 11, 2015 to July 31, 2015;		
	Doe v. Uber Technologies, Inc.	1 Stipulation and Proposed Order Case No. 3:15-cv-00424-(SI)	

1	2. The parties respectfully request that the initial case management conference be		
2	continued from June 19, 2015 to August 7, 2015, or another date amenable to the Court; and		
3	3. The parties are still discussing their competing views about the propriety of		
4	discovery at this stage, but agree in the short term that all discovery shall be stayed at least until		
5			
6	August 7, 2015, or seven days before the date of the initial case management conference,		
7	whichever is later. Uber U.S. reserves all rights to object to discovery, including but not limited		
8	to whether Uber U.S. should be required to provide initial disclosures prior to resolution of		
9	motions to dismiss.		
10			
11	4. The parties respectfully request that the Court hold in abeyance the briefing		
12	schedule for Defendant's pending motions to dismiss (Docket No. 29, 31), to be set by the Court		
13	at the initial case management conference.		
14	Dated: May 11, 2015		
15	San Francisco, CA		
16	Respectfully submitted,		
17	WIGDOR LLP		
18			
19	By: <u>/s/ Jeanne M. Christensen</u>		
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	Doe v. Uber Technologies, Inc.	3 Stipulation and Proposed Orde

1 2	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA		
3 4 5	JANE DOE, Plaintiff,	Case No.: 3:15-cv-00424(SI) [PROPOSED] ORDER	
6 7 8 9	vs. UBER TECHNOLOGIES, INC., Defendant.		
10 11 12 13		IT IS SO ORDERED that Plaintiff is granted leave Fed. R. Civ. P. 15(a)(2) in this matter by July 31,	
14 15 16 17 18 19	 IT IS FURTHER ORDERED that the initial case management conference is continued from June 18, 2015 to [August 7, 2015] or [_at 2:30 p.m.]. IT IS FURTHER ORDERED that discovery is stayed until August 7, 2015, or until a date set by the Court at the initial case management conference. IT IS FURTHER ORDERED that the briefing schedule on Defendant's motions to 		
 20 21 22 23 24 25 26 27 28 	dismiss is held in abeyance until the initial ca a schedule if necessary. Date: May <u>19</u> 2015	ase management conference, when the Court will set	
	Doe v. Uber Technologies, Inc.	4 Stipulation and Proposed Order Case No. 3:15-cv-00424-(SI)	