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7 Attorneys for Defendants
Uber Technologies, Inc. and Rasier, LLC

8 UNITED STATES DISTRICT COURT
9
10 NORTHERN DISTRICT OF CALIFORNIA

11 MICHAEL NOKCHAN,
12
13 Plaintiff,

14 v.

15 UBER TECHNOLOGIES, INC. et al.,
16
17 Defendants.

Case No. 15-CV-03009-EMC

**STIPULATION FOR EXTENSION OF
TIME TO FILE RESPONSIVE PLEADING**

18 Pursuant to Local Civil Rule 6-1, the parties, through their undersigned counsel,
19 hereby stipulate and agree that Defendants Uber Technologies, Inc. ("Uber"), Rasier, LLC
20 ("Rasier"), and Hirease LLC ("Hirease") (collectively "Defendants") may have until fourteen (14)
21 days after the Court's ruling on the motion to consolidate in *Gillette v. Uber Technologies, Inc. et*
22 *al.*, Civil Action No. 14-cv-05241 (ECF No. 84) or the filing of a Consolidated Complaint that
23 includes the captioned matter, whichever is later, to file their answer, motion or other response to
24 the Complaint of Plaintiff Michael Nokchan in the captioned matter.

25 Plaintiff filed his Complaint on June 29, 2015. On July 24th, Plaintiff and
26 Defendants Uber and Rasier stipulated for an extension of time to respond to the Complaint until
27 August 13, 2015. Defendants Uber and Rasier received an additional extension of time to respond
28 until August 21, 2015 to meet and confer in good faith regarding the most efficient way to proceed

STIPULATION FOR EXTENSION

1.

Case No. 15-CV-03009-EMC

1 in light of this Court's previous rulings in the related cases of *Gillette v. Uber Technologies, Inc. et*
2 *al.*, Civil Action No. 14-cv-05241 and *Mohamed v. Uber Technologies, Inc. et al.*, Civil Action No.
3 14-cv-5200. Subsequent to that stipulation, Ronald Gillette filed a motion to consolidate the
4 *Gillette, Mohamed, and Nokchan* litigation. As a result of that motion and the parties' meet and
5 confer efforts, they now agree the most efficient course is to await the final outcome of the motion to
6 consolidate before Defendants are required to respond to the Complaint in this matter and Plaintiff
7 Nokchan is required to take further action. Furthermore, Hirease's original responsive pleading
8 deadline is August 31, 2015, and has obtained no previous extensions of time to respond. No
9 objections, arguments, or defenses are waived by any party by virtue of this stipulation. This
10 stipulation will not require the alteration of any deadline already set by Court Order. Indeed, the
11 Court's August 3, 2015 Order (ECF No. 19) set the initial case management conference for this
12 matter for November 12, 2015.

13 In compliance with Local Rule 5-1(i)(3), Plaintiff's counsel, Shaun Setareh, and
14 Hirease's counsel, Timothy Hix, has concurred in this filing and use of their electronic signatures
15 below.

1 Dated: August 21, 2015

2
3 /s/ Rod M. Fliegel

4 ROD M. FLIEGEL
5 LITTLER MENDELSON, P.C.
6 Attorneys for Defendants
7 UBER TECHNOLOGIES, INC. AND
8 RASIER, LLC

9 /s/ Shaun Setareh

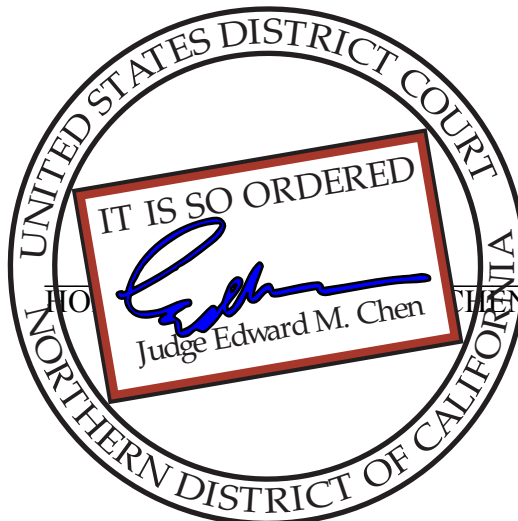
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18 MICHAEL NOKCHAN

19 /s/ Timothy L. Hix

20 Timothy L. Hix, Esquire
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22 333 S. Hope Street, Suite 3900
23 Los Angeles, CA 90071-1406
24 thix@seyfarth.com
25 Attorneys for Defendant
26 HIREASE LLC

27 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

28 Dated: 8/21/15



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CERTIFICATE OF SERVICE

I, Rod M. Fliegel, hereby certify that on this date I caused a true and correct copy of the foregoing Stipulation for Extension of Time to File Responsive Pleading to be filed with the Court and served upon the following:

Via CM/ECF:

Shaun Setareh, Esquire

Tuvia Korobkin, Esquire

Setareh Law Group

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Attorneys for Plaintiff

/s/ Rod M. Fliegel

Rod M. Fliegel

Dated: August 21, 2015