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Tan v. Grubhub, Inc.

Doc. 35

Plaintiffs Andrew Tan and Raef Lawson and Defendants GrubHub Holdings Inc. and GrubHub Inc., by and through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS, Defendants filed their Motion to Dismiss First Amended Complaint Or, Alternatively, Stay All PAGA Claims (the "Motion") on January 29, 2016, noticed for a hearing on March 8, 2016;

WHEREAS, on February 3, 2016, the Court issued a briefing schedule setting February 12, 2016 as the deadline for responses to Defendants' Motion, February 19, 2016 as the deadline for replies, and March 10, 2016 as the hearing date;

WHEREAS, on February 3, 2016, the Court continued the Case Management Conference from February 11, 2016 to March 31, 2016;

WHEREAS, Plaintiffs are not available to attend a hearing on March 8, 2016 or March 10, 2016;

WHEREAS, the parties have conferred and Defendants do not oppose Plaintiffs' request to continue the hearing date for Defendants' Motion;

WHEREAS, the parties are not seeking a continuance of the Opposition and Reply deadlines; WHEREAS, both parties are available to attend the hearing on Defendants' Motion on March 24, 2016, if that date is convenient for the Court; and

WHEREAS, if the Court continues the hearing on Defendants' Motion to March 24, 2016, the parties agree that the Case Management Conference should be continued from March 31, 2016 to April 14, 2016 (maintaining the 21-day interval between the Motion hearing and the Case Management Conference in the current schedule).

NOW THEREFORE IT IS HEREBY STIPULATED THAT the deadline for Plaintiffs to file their Opposition to Defendants' Motion shall be set as February 12, 2016, the deadline for Defendants to file their Reply in support of the Motion shall be set as February 19, 2016, the hearing on the Motion shall be continued to March 24, 2016, and the Case Management Conference shall be continued to April 14, 2016.

1	Dated: February 8, 2016	Respectfully submitted,
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4		Respectfully submitted, ANDREW TAN and RAEF LAWSON, in their capacity
5 6		as Private Attorney General Representatives, and RAEF LAWSON, on behalf of himself and all others similarly situated, PLAINTIFFS
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8		By their attorneys,
9		/s/ Shannon Liss-Riordan Shannon Liss-Riordan, <i>pro hac vice</i>
10		Thomas Fowler, <i>pro hac vice</i> LICHTEN & LISS-RIORDAN, P.C.
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13		Email: sliss@llrlaw.com, tfowler@llrlaw.com
14		
15		Matthew Carlson (SBN 273242) CARLSON LEGAL SERVICES
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17		(510) 239-4710
18		Email: mcarlson@carlsonlegalservices.com
19		
20		GRUBHUB HOLDINGS INC. and GRUBHUB INC., DEFENDANTS,
21		By their attorneys,
22		GIBSON, DUNN & CRUTCHER LLP
23		
24	Dated: February 10, 2016	By: /s/ Dhananjay S. Manthripragada
25	STES DISTRICT	Dhananjay S. Manthripragada
26		Attorneys for Defendants GRUBHUB HOLDINGS
27	GRANTED S	INC. and GRUBHUB INC.
28	Judge Jacqueline Scott Corley	3