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5					
6	Attorneys for Defendants Google Inc., PayPal, Inc.,				
7	and Stripe, Inc.				
8	UNITED STATES DISTRICT COURT				
9	NORTHERN DISTRICT OF CALIFORNIA				
10	SAN FRANCISCO DIVISION				
11	ABU MAISA, INC., a California) CASE NO. 3:15-cv-06338-JST			
12	corporation., on behalf of itself and all				
13	others similarly situated,				
14	Plaintiffs,	JOINT STIPULATION AND			
15	VS.) [PROPOSED] ORDER TO MODIFY) MEDIATION DEADLINE			
16					
17	FLINT MOBILE, INC. a Delaware corporation, GOOGLE, INC., a				
18	Delaware corporation, INTUIT, INC., a				
19	Delaware corporation, PAYPAL, INC., a Delaware corporation, SQUARE,				
20	INC., a Delaware corporation, STRIPE,				
21	INC., a Delaware corporation,				
22	Defendant.				
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Case No. 3:15-cv-06 JOINT STIPULATION AND [PROPOSED] ORDER TO MODIFY MEDIATION DEA					
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Plaintiff Abu Maisa, Inc. ("Plaintiff") and Defendants Google Inc., Intuit Inc.,
 PayPal, Inc., Square, Inc., and Stripe, Inc. ("Defendants") hereby enter the following
 Joint Stipulation and [Proposed] Order to modify deadlines currently established by
 this Court's Orders in the above-captioned proceeding:

5 WHEREAS, on March 16, 2016, the parties submitted, and this Court
6 approved, a Stipulation and Proposed Order requiring the parties to participate in
7 mediation under this Court's ADR Local Rules on or before September 16, 2016
8 (Dkt. Nos. 32; 36);

9 WHEREAS, this action is related to White v. Square, No. 3:15-cv-04539-JST
10 ("White v. Square"), currently before this Court;

WHEREAS, on August 25, 2016, the parties submitted a Stipulation and
Proposed Order extending the deadlines to conduct (1) a private mediation, and (2)
the Initial Case Management Conference, to 60 days and 75 days, respectively, after
a ruling on the pending Motion to Dismiss the Second Amended Complaint in White
v. Square (Dkt. No. 50);

16 WHEREAS, on August 29, 2016, the Court granted the parties' Stipulation17 and Proposed Order;

18 WHEREAS, on September 14, 2016, the Court granted Defendant's Motion
19 to Dismiss Second Amended Complaint, with prejudice, in White v. Square;

20 WHEREAS, the parties' deadline to conduct a private mediation is currently
21 November 14, 2016;

WHEREAS, a motion to dismiss is currently pending in this action (Dkt. No.
53) that seeks to dismiss Plaintiff's claims against defendants for the same reasons
the Court granted defendant Square, Inc.'s motion to dismiss in the White v. Square
action. In particular, Defendants argue that Plaintiff lacks statutory standing to
bring claims under the California Unruh Civil Rights Act because it never sought to
sign up for the Defendants' services;

28

WHEREAS, a motion for a new trial is currently pending in White v. Square
 (White v. Square, Dkt. No. 61);

WHEREAS, the parties agree that the outcome of this Court's decision on
Defendants' Motion to Dismiss the First Amended Complaint may substantially
influence, and potentially moot, the need for mediation in this case;

6 WHEREAS, this Court has moved the deadline to conduct mediation on one
7 prior occasion (Dkt. No. 51), and has moved the Case Management Conference on
8 two prior occasions (Dkt. No. 48 and Dkt. No. 51) for purposes of judicial efficiency
9 because this action raises substantially the same standing issue that has been the
10 subject of Square's motions to dismiss in White v. Square;

WHEREAS, the parties filed an initial Joint Case Management Statement on
April 6, 2016 (Dkt. No. 43), and the case has not advanced substantively since that
date due to developments in White v. Square;

WHEREAS, due to the unresolved state of the pleadings and to preserve the
parties' and the Court's time and resources, the parties agree that the current
schedule should be extended;

NOW THEREFORE, pursuant to Northern District of California Civil Local
Rules 6-1 and 6-2, Defendants and Plaintiff Abu Maisa, Inc., by and through their
counsel of record, hereby stipulate, subject to the Court's approval, as follows:

STIPULATION

The deadline to conduct a private mediation by an agreed-upon
 mediator shall be moved from November 14, 2016, to February 27, 2017.

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24	DATED: October 24, 2016	MCGRANE PC	
25		By /s/ William McGrane	
26		William McGrane	
27		Attorneys for Plaintiff ABU MAISA, INC.	
28		ADU MIAISA, INC.	
		-2- Case No. 3:15-cv-06338-J	JST
	JOINT STIPULATIO	N AND [PROPOSED] ORDER TO MODIFY MEDIATION DEADLI	NE

1	DATED: October 24, 2016	QUINN EMANUEL URQUHART & SULLIVAN, LLP
3		By /s/ Diane Doolittle
4		Diane Doolittle
5		Attorneys for Defendants GOOGLE INC., PAYPAL, INC. and
6		STRIPE, INC.
7	DATED: October 24, 2016	WILSON SONSINI GOODRICH & ROSATI Professional Corporation
8		-
9		By /s/ Colleen Bal Colleen Bal
10		Attorneys for Defendant
11		SQUARE INC.
12	DATED: October 24, 2016	GIBSON, DUNN & CRUTCHER LLP
13		By /s/ Austin Schwing
14		Austin Schwing
15		Attorneys for Defendant INTUIT Inc.
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		-3- Case No. 3:15-cv-06338-JST
	JOINT STIPULATIO	N AND [PROPOSED] ORDER TO MODIFY MEDIATION DEADLINE

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1 2	PURSUANT TO STIPULATION, IT IS SO ORDERED.
3	DATED: October 25, 2016
4	Honorable Jon S. Tegar
5	United States District Judge
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	-4- Case No. 3:15-cv-06338-JST JOINT STIPULATION AND [PROPOSED] ORDER TO MODIFY MEDIATION DEADLINE
	JOINT STIPULATION AND [PROPOSED] ORDER TO MODIFY MEDIATION DEADLINE