

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Shon Morgan (Bar No. 187736)
3 shonmorgan@quinnemanuel.com
4 865 South Figueroa Street, 10th Floor
5 Los Angeles, California 90017-2543
6 Telephone: (213) 443-3000
7 Facsimile: (213) 443-3100

8 Arthur M. Roberts (Bar No. 275272)
9 arthurroberts@quinnemanuel.com
10 50 California Street, 22nd Floor
11 San Francisco, California 94111
12 Telephone: (415) 875-6600
13 Facsimile: (415) 875-6700

14 Attorneys for Defendant Uber Technologies, Inc.

15
16 Kristopher P. Badame (Bar No. 210349)
17 Joseph H. Hunter (Bar No. 137796)
18 Michele E. Pillette (Bar No. 262031)
19 **BADAME & ASSOCIATES, APC**
20 25432 Trabuco Road, Suite 207
21 Lake Forest, CA 92630
22 (949) 770-2867
23 (866) 230-3044 – FAX
24 kbadame@badameandassociates.com
25 jhunter@badameandassociates.com

26 Attorneys for Plaintiff Michael Cordas

27 UNITED STATES DISTRICT COURT
28 NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

29 MICHAEL CORDAS, individually, and on
30 behalf of all those similarly situated,

31 Plaintiffs,

32 vs.

33 UBER TECHNOLOGIES, INC., and DOES 1
34 through 50, inclusive,

35 Defendants.

Case No. 3:16-cv-04065-RS

**STIPULATION AND ~~PROPOSED~~
ORDER FOR 60-DAY STAY TO PERMIT
JOINT FACTUAL INVESTIGATION**

Complaint filed: July 20, 2016

1 Plaintiff Michael Cordas and defendant Uber Technologies, Inc. hereby stipulate as
2 follows:

3 WHEREAS, Plaintiff filed the Complaint on July 20, 2016 and served it on Defendant on
4 July 21, 2016;

5 WHEREAS, the parties filed a stipulation pursuant to L.R. 6-1(a) extending the time to
6 answer or otherwise respond to the Complaint until September 12, 2016;

7 WHEREAS, counsel for the parties have had discussions regarding the nature of the
8 dispute, allegations in the Complaint, defenses to those allegations, and scheduling;

9 WHEREAS, counsel for the parties share an interest in advancing this matter as efficiently
10 and expeditiously as possible and would like to continue these discussions;

11 WHEREAS, the parties intend in the coming weeks to further informally exchange factual
12 analyses and continue discussions to evaluate the claims and defenses;

13 WHEREAS, extending the time Uber has to answer or otherwise respond to the complaint
14 will not alter the date of any event or any deadline already fixed by Court order.

15 THEREFORE, IT IS HEREBY STIPULATED AND AGREED that this matter shall be
16 stayed until October 26, 2016 to permit the parties to pursue these discussions, and Uber shall
17 answer or otherwise respond to the Complaint by November 18, 2016.

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19 DATED: August 26, 2016

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Shon Morgan¹

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Shon Morgan
Attorneys for Uber Technologies, Inc.

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¹ Pursuant to L.R. 5-1(i), I, Shon Morgan, attest that I have obtained concurrence in the filing of this document from each of the signatories.

1 DATED: August 26, 2016

BADAME & ASSOCIATES, APC

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By /s/ Kristopher P. Badame
Kristopher P. Badame
Attorneys for Plaintiff Michael Cordas

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 8/29/16



Judge Richard Seeborg