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15 IN THE UNITED STATES DISTRICT COURT
 16 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

18 SCOTT CRAWFORD and JARVIS
 JERNIGAN, JR.,
 19 Plaintiffs,
 20 v.
 21 UBER TECHNOLOGIES, INC. and RASIER,
 LLC,
 22 Defendants.

Case No. 3:17-cv-02664-RS

**STIPULATION TO CONSOLIDATE
 FACT DISCOVERY AND ENTER
 PROTECTIVE ORDER IN RELATED
 CASES**

Judge: Hon. Richard Seeborg

23 STEPHAN NAMISNAK and FRANCIS
 FALLS,
 24 Plaintiffs,
 25 v.
 26 UBER TECHNOLOGIES, INC. and RASIER,
 27 LLC,
 28 Defendants.

Case No. 3:17-cv-06124-RS

**STIPULATION TO CONSOLIDATE
 FACT DISCOVERY AND ENTER
 PROTECTIVE ORDER IN RELATED
 CASES**

Judge: Hon. Richard Seeborg

Case No. 3:17-cv-02664-RS

1 Plaintiffs Scott Crawford and Jarvis Jernigan, Jr. (“Crawford Plaintiffs”), Plaintiffs
2 Stephan Namisnak and Francis Falls (“Namisnak Plaintiffs”) (collectively, “Plaintiffs”), and
3 Defendants Uber Technologies, Inc. and Rasier, LLC (“Defendants”) (together, with Plaintiffs,
4 the “Parties”), through counsel, hereby submit this Stipulation to Consolidate Fact Discovery and
5 Enter Protective Order in the captioned actions, and jointly move this court to so order.

6 1. WHEREAS, the Crawford Plaintiffs commenced the action styled *Crawford v.*
7 *Uber Technologies, Inc.*, No. 3:17-cv-02664-RS (N.D. Cal.), on May 9, 2017 (“Crawford
8 Action”);

9 2. WHEREAS, the Namisnak Plaintiffs, along with Mitchell Miraglia, commenced
10 the action styled *Namisnak v. Uber Technologies, Inc.*, No. 3:17-cv-06124-RS (N.D. Cal.), on
11 October 26, 2017 (“Namisnak Action”). On May 8, 2018, the Namisnak Plaintiffs filed a First
12 Amended Complaint, to which Mr. Miraglia is not a party. *Namisnak*, ECF No. 54.

13 3. WHEREAS, by order dated November 14, 2017, this Court deemed the Crawford
14 Action and the Namisnak Action as related cases under Civil Local Rule 3-12(a). *Crawford*,
15 ECF No. 58; *Namisnak*, ECF No. 24.

16 4. WHEREFORE, the Parties have conferred and agreed that consolidating fact
17 discovery in the Crawford Action and the Namisnak Action, in the manner set forth in **Appendix**
18 **A**, would serve the purposes of Civil Local Rule 3-12 and allow fact discovery to proceed in a
19 manner that is most efficient for the Parties and the Court. The Parties have further conferred
20 and agreed that entry of the Protective Order attached as **Appendix B** in the Crawford Action,
21 and entry of the Protective Order attached as **Appendix C** in the Namisnak Action will and is
22 necessary to facilitate consolidated fact discovery.

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24 [SIGNATURES APPEAR ON FOLLOWING PAGE]
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Dated: June 15, 2018, 2018

Respectfully submitted,
MORGAN, LEWIS & BOCKIUS LLP

By s/ Anne Marie Estevez
Anne Marie Estevez
Stephanie Schuster
Patrick Harvey
Clara Kollm
Kathy H. Gao

Attorneys for Defendants

Dated: June 15, 2018, 2018

s/ William Most
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PURSUANT TO STIPULATION IT IS SO ORDERED.

Dated: 7/17, 2018


HON. RICHARD SEEBORG