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 25 *John Zimmer, Brian Roberts, Prashant (Sean)*
 26 *Aggarwal, Jonathan Christodoro, Ben Horowitz,*
 27 *Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann*
 28 *Miura-Ko, and Mary Agnes (Maggie) Wilderotter*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

<p>21 In re LYFT, INC. SECURITIES 22 LITIGATION</p>	<p>Master File No. 4:19-cv-02690-HSG</p>
<p>23 This Document Relates to: 24 ALL ACTIONS</p>	<p><u>CLASS ACTION</u> JOINT STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULE ON PLAINTIFF'S MOTION FOR CLASS CERTIFICATION</p>

Master File No. 4:19-cv-02690-HSG

CLASS ACTION

**JOINT STIPULATION AND
 ORDER TO EXTEND BRIEFING
 SCHEDULE ON PLAINTIFF'S
 MOTION FOR CLASS
 CERTIFICATION**

1 Pursuant to Local Rules 6-2 and 7-12, Defendants Lyft, Inc., Logan Green, John Zimmer,
2 Brian Roberts, Prashant (Sean) Aggarwal, Jonathan Christodoro, Ben Horowitz, Valerie Jarrett,
3 David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes Wilderotter (the “Lyft
4 Defendants”) and Lead Plaintiff, Rick Keiner (“Plaintiff”, and together with the Lyft Defendants,
5 the “Parties”), through their counsel, submit the following Joint Stipulation and [Proposed] Order
6 To Extend Briefing Schedule on Plaintiff’s Motion for Class Certification.

7 WHEREAS, on March 26, 2020, the Court issued a Scheduling Order setting a briefing
8 schedule for Plaintiff’s amended complaint and Defendants’ motion to dismiss per the Parties’
9 joint proposal (ECF No. 72);

10 WHEREAS, on April 16, 2020, pursuant to the Scheduling Order, Plaintiff filed the
11 Consolidated Amended Class Action Complaint for Violation of the Federal Securities Laws (the
12 “Complaint”) (ECF No. 74);

13 WHEREAS, on May 17, 2020, pursuant to the Scheduling Order, the Lyft Defendants
14 filed their Motion to Dismiss the Complaint (ECF No. 78);

15 WHEREAS, on June 11, 2020, pursuant to the Scheduling Order, Plaintiff filed his
16 opposition to the Lyft Defendants’ Motion to Dismiss the Complaint (ECF No. 84);

17 WHEREAS, on June 24, 2020, the Court granted the Parties’ Joint Stipulation to Extend
18 the Briefing Schedule On Lyft Defendants’ Motion to Dismiss (the “Briefing Extension Order”)
19 (ECF. No. 87);

20 WHEREAS, pursuant to the Briefing Extension Order, the Lyft Defendants filed their
21 Reply in Support of Motion to Dismiss the Complaint on July 9, 2020 (ECF. No. 88);

22 WHEREAS, on September 8, 2020, the Court issued its Order Granting In Part and
23 Denying in Part Defendants’ Motion to Dismiss (ECF No. 96);

24 WHEREAS, on September 25, 2020, Plaintiff filed his Motion for Class Certification
25 (ECF No. 98);

26 WHEREAS, the Lyft Defendants’ Opposition to the Motion for Class Certification (the
27 “Opposition”) is currently due to be filed on October 9, 2020;

28 WHEREAS, to accommodate for the press of business and ensure adequate time for

1 briefing, counsel for the Parties have met and conferred, and agree to extend the date for the
2 Opposition from October 9, 2020 to January 12, 2021; the date for Plaintiff's Reply from
3 October 16, 2020 to January 22, 2021; and the hearing currently set for December 17, 2020 at
4 2:00 p.m. shall be set for February 4, 2021 at 2:00 p.m., or a date otherwise set by the Court.

5 WHEREAS, this extension of time will not alter the date of any event or deadline already
6 fixed by Court order;

7 WHEREAS, this stipulation is not intended to operate as an admission of any factual
8 allegation or legal conclusion and is submitted subject to and without waiver of any right,
9 defense, affirmative defense, or objection;

10 NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate,
11 subject to Court approval, that the briefing schedule for the Motion for Class Certification will be
12 modified as follows:

13 1. The Lyft Defendants shall file their Opposition to the Motion for Class
14 Certification by January 12, 2021.

15 2. Plaintiff shall file a Reply in support of his Motion for Class Certification by
16 January 22, 2021.

17 3. The noticed date for a hearing on the Motion for Class Certification shall be set
18 for February 4, 2021 at 2:00 p.m., or a date otherwise set by the Court.

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20 Stipulated and agreed to by:

21 Date: October 8, 2020
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/s/ Jacob A. Walker

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FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: October 8, 2020

/s/ Colleen C. Smith
Colleen C. Smith

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED except the noticed date for a hearing on the Motion for Class Certification shall be set for February 18, 2021 at 2:00 p.m.

Date: 10/13/2020


HONORABLE HAYWOOD S. GILLIAM, JR.
U.S. DISTRICT JUDGE