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24 *Attorneys for Defendants Lyft, Inc., Logan
 25 Green, John Zimmer, Brian Roberts, Prashant
 26 (Sean) Aggarwal, Ben Horowitz, Valerie Jarrett,
 27 David Lawee, Hiroshi Mikitani, Ann Miura-Ko,
 28 and Mary Agnes (Maggie) Wilderotter and Non-
 Party Jonathan Christodoro*

Additional Counsel on Signature Page

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

In re LYFT INC. SECURITIES LITIGATION

MASTER FILE NO. 4:19-CV-02690-HSG

This Document Relates to:

ALL ACTIONS

**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 September 25, 2020, Plaintiff filed a Motion for Class Certification (ECF
8 No. 98);

9 WHEREAS, the Lyft Defendants’ Opposition to the Motion for Class Certification (the
10 “Opposition”) was originally due to be filed on October 9, 2020;

11 WHEREAS, the Parties agreed to extend the date for the Opposition from October 9, 2020
12 to January 12, 2021 and the date for Plaintiff’s Reply in support of his Motion for Class
13 Certification (the “Reply”) from October 16, 2020 to January 22, 2021 (ECF No. 100);

14 WHEREAS, this Court entered the stipulation as an order of the Court on October 13, 2020
15 and set a date for hearing on the Motion for Class Certification for February 18, 2021 at 2:00 p.m.
16 (ECF No. 102);

17 WHEREAS, on December 29, 2020 the Court rescheduled the date for a hearing on the
18 Motion for Class Certification to March 11, 2021 at 2:00 p.m. (ECF No. 105);

19 WHEREAS, in light of what the Lyft Defendants believe to be the complex issues involved
20 in the Motion for Class Certification and to accommodate the Lyft Defendants’ request for
21 adequate time for addressing these issues and for briefing and for Plaintiff to have adequate time
22 to respond, counsel for the Parties have met and conferred, and agree to extend the date for the
23 Opposition from January 12, 2021 to January 19, 2021 and the date for Plaintiff’s Reply from
24 January 22, 2021 to February 5, 2021;

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

27 WHEREAS, this stipulation is not intended to operate as an admission of any factual
28 allegation or legal conclusion and is submitted subject to and without waiver of any right, defense,

1 affirmative defense, or objection;

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

5 1. The Lyft Defendants shall file their Opposition to the Motion for Class Certification
6 by January 19, 2021.

7 2. Plaintiff shall file a Reply in support of his Motion for Class Certification by
8 February 5, 2021.

9
10 Stipulated and agreed to by:

11 Date: January 6, 2021

12
13
14 **BLOCK & LEVITON LLP**

/s/ Jacob A. Walker

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Lead Counsel and Counsel for Plaintiff

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*Prashant Aggarwal, Jonathan
Christodoro, Ben Horowitz, Valerie
Jarrett, David Lawee, Hiroshi Mikitani,
Ann Miura-Ko, and Mary Agnes
Wilderotter*

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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: January 6, 2021

/s/Colleen C. Smith
Colleen C. Smith

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 1/7/2021


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