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 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*

*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 LEAD PLAINTIFF'S  
 MOTION FOR LEAVE TO FILE  
 [PROPOSED] SECOND AMENDED  
 CLASS ACTION COMPLAINT (as  
 modified)**

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 (the “Plaintiff,” and together with the Lyft  
5 Defendants, the “Parties”), through their counsel, submit the following Joint Stipulation and  
6 [Proposed] Order To Extend Briefing Schedule on Lead Plaintiff’s Motion for Leave to File  
7 [Proposed] Second Amended Class Action Complaint (ECF No. 206).

8 WHEREAS, on September 30, 2021, Lead Plaintiff Rick Keiner filed a Motion for Leave  
9 to File [Proposed] Second Amended Class Action Complaint (the “Motion” or “Motion for  
10 Leave”) (ECF No. 206);

11 WHEREAS, pursuant to the Court’s Scheduling Notes in effect when the Motion was  
12 filed, the hearing on the Motion was set for February 3, 2022;

13 WHEREAS, on October 14, 2021, pursuant to the Parties’ stipulation, the Court extended  
14 Defendants’ deadline to respond to the Motion until November 30, 2021, and Plaintiffs’ deadline  
15 to reply to the Motion until January 7, 2022;

16 WHEREAS, the Parties have met and conferred and agree to extend the date for the filing  
17 of the Opposition from November 30, 2021, to December 20, 2021, and the date for the filing of  
18 the Reply from January 7, 2022, to January 18, 2022;

19 WHEREAS, modest extensions of the deadlines for the Opposition and the Reply will  
20 permit the parties to continue meeting their concurrent discovery obligations efficiently, while  
21 making mutual reasonable accommodations in light of the upcoming holidays.

22 WHEREAS, there will still be ample time for the Court to consider the Opposition and  
23 Reply prior to the February 3, 2022, hearing on the Motion, and this extension of time will not  
24 alter the date of any event or deadline already fixed by Court order;

25 NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate,  
26 subject to Court approval, that the briefing schedule for the Motion for Leave will be modified as  
27 follows:  
28

1           1.       The Lyft Defendants shall file their Opposition to the Motion for Leave by  
2 December 20, 2021; and

3           2.       Plaintiff shall file a Reply in support of his Motion for Leave by January 18,  
4 2021.

5  
6 Dated: November 17, 2021

7 Stipulated and agreed to by:

8  
9       **BLOCK & LEVITON LLP**

10       /s/ Jeffrey C. Block  
11       Jeffrey C. Block (*admitted pro hac vice*)  
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19       *Lead Counsel and Counsel for Plaintiff*  
20       *and the Class*

21       **LATHAM & WATKINS LLP**

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45       *Logan Green, John Zimmer, Brian Roberts,*  
46       *Prashant (Sean) Aggarwal, Ben Horowitz,*  
47       *Valerie Jarrett, David Lawee, Hiroshi*  
48       *Mikitani, Ann Miura-Ko, and Mary Agnes*  
49       *(Maggie) Wilderotter*

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**FILER'S ATTESTATION**

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

Dated: November 17, 2021

/s/ Colleen C. Smith  
Colleen C. Smith

\* \* \*

PURSUANT TO STIPULATION, IT IS SO ORDERED except the Plaintiff shall file a Reply in support of his Motion for Leave by January 18, 2022.

Date: 11/18/2021

Haywood S. Gilliam, Jr.  
HONORABLE HAYWOOD S. GILLIAM, JR.  
U.S. DISTRICT JUDGE