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Attorneys for Plaintiff EFL Global LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

EFL GLOBAL LLC, a New York Limited Liability Company,

Plaintiff,

v.

UBER FREIGHT LLC, a Delaware Limited Liability Company.

Defendant.

Case No. 3:25-cv-07214

The Honorable Judge Charles Breyer

JOINT STIPULATION AND ~~[PROPOSED]~~ ORDER TO MODIFY CASE SCHEDULE

Action Filed: August 26, 2025

JOINT STIPULATION

Plaintiff EFL Global LLC ("Plaintiff") and Defendant Uber Freight LLC ("Defendant") (collectively referred to as the "Parties"), hereby submit, through their undersigned counsel of record, the following Stipulation:

WHEREAS, on July 10, 2026, Defendant filed its Motion to Dismiss the operative Second Amended Complaint (the "Motion") (Doc. 41);

WHEREAS, the hearing on the Motion is currently set for November 13, 2026 (Doc. 47);

WHEREAS, under the case schedule set forth in the Parties' Joint Case Management Conference Statement and Rule 26(f) Report (Doc. 24), November 13, 2026 is also the deadline for the Parties to file their opening cross-dispositive motion briefs;

WHEREAS, the current case schedule accordingly requires adjustment;

WHEREAS, the current case schedule sets the fact discovery cut-off for September 30, 2026 and the expert discovery deadline for October 28, 2026, both of which are approaching, and neither party has taken any discovery to date pending the Court's ruling on the Motion;

WHEREAS, the Parties have met and conferred and agree that good cause exists to revise the case schedule as set forth below;

NOW, THEREFORE, the Parties stipulate, through their respective counsel of record, and respectfully request that the Court order, that the case schedule be revised as follows:

Fact Discovery Cut-Off: June 14, 2027

Expert Discovery: July 12, 2027

Cross-Dispositive Motion Opening Brief: July 28, 2027

Cross-Dispositive Motion Opposition Brief: September 24, 2027

Cross-Dispositive Motion Reply: October 22, 2027

Hearing on Cross-Dispositive Motions: Friday, November 19, 2027

Trial: TBD [Spring 2028]

IT IS SO STIPULATED.

Dated: August 25, 2026

ERVIN COHEN & JESSUP LLP
Robert M. Waxman
Joseph E. Rosenbaum

By: */s/ Robert M. Waxman*
Robert M. Waxman
Attorney for Plaintiff EFL Global LLC

Dated: August 25, 2026

PEACOCK PIPER TONG + VOSS LLP
Albert E. Peacock III
Glen R. Piper
Jolene R. Rice

By: */s/ Jolene R. Rice*
Jolene R. Rice
Attorney for Defendant Uber Freight LLC

CIV. L.R. 5-1(i)(3) ATTESTATION

I, Robert M. Waxman, hereby attest that all signatories listed herein, and on whose behalf this filing is submitted, concur in this filing's content and have authorized this filing.

By: */s/ Robert M. Waxman*
Robert M. Waxman

~~[PROPOSED]~~ ORDER

Pursuant to the Parties' Joint Stipulation to Modify Case Schedule, IT IS HEREBY ORDERED that the case schedule is revised as follows:

Fact Discovery Cut-Off: June 14, 2027

Expert Discovery: July 12, 2027

Cross-Dispositive Motion Opening Brief: July 28, 2027

Cross-Dispositive Motion Opposition Brief: September 24, 2027

Cross-Dispositive Motion Reply: October 22, 2027

Hearing on Cross-Dispositive Motions: November 19, 2027

Trial: TBD [Spring 2028]

IT IS SO ORDERED.

DATED: August 27, 2026

By: _____
Hon. Judge Charles Breyer
United States Judge