

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**FORT LAUDERDALE DIVISION**

**Case No. 0:17-cv-61617-BB**

JOSE MEJIA, individually and on  
Behalf of all others similarly situated  
situated,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC., a  
Delaware corporation

Defendant.

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**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant, Uber Technologies, Inc. ("Uber"), pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 7.1, respectfully moves the Court for an order extending the time permitted for Uber to respond to Plaintiff's Complaint. Counsel for Uber has contacted counsel for Plaintiff and counsel for Plaintiff has agreed to and does not oppose the relief requested herein. In support of this Motion, Uber states as follows:

1. On August 11, 2017, Plaintiff filed a putative class action Complaint in this Court (ECF. No. 1).

2. On August 17, 2017, Uber's was served with the Summons and the Complaint. Thus, in accordance with the Federal Rules of Civil Procedure, Uber's response to the Complaint is due on or before September 7, 2017.

3. Undersigned counsel only was recently retained to represent Uber in this putative class action.

4. In order to further investigate Plaintiff's allegations and adequately respond to the Complaint and due to pre-existing commitments, undersigned counsel for Uber seeks a twenty-one (21) day extension, up through and including September 20, 2017, to respond to Plaintiff's Complaint.

5. Counsel for Uber has conferred with counsel for the Plaintiff regarding this Motion and Counsel for the Plaintiff consents to this requested extension.

6. This Motion is filed in good faith and not for dilatory or other improper purpose.

7. Plaintiff will suffer no prejudice from the requested extension of time.

8. By appearing and requesting this extension of time, Uber does not waive any arguments it may have related to sufficiency of service of process, personal jurisdiction, failure to state a claim, arbitration or any other defense or objection to this case proceeding.

WHEREFORE, Defendant Uber Technologies, Inc. respectfully requests that the Court grant it an extension of time up to and including September 20, 2017, within which to respond to Plaintiff's Complaint.

**LOCAL RULE 7.1(a)(3) CERTIFICATION**

Counsel for Uber conferred with counsel for Plaintiff regarding the relief requested herein, and counsel for Plaintiff has agreed to and does not oppose the Motion.

Dated: August 31, 2017

Respectfully submitted,

/s/ Edward M. Mullins

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*Counsel for Defendant Uber Technologies, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2017 I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel or parties of record.

/s/ Edward M. Mullins

Edward M. Mullins (FBN 863920)