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25 *Co-Lead Counsel for Plaintiffs*

26 UNITED STATES DISTRICT COURT

27 NORTHERN DISTRICT OF CALIFORNIA

28 IN RE LYFT, INC. DERIVATIVE
LITIGATION

Lead Case No. 4:20-cv-09257-HSG

**STIPULATION AND ORDER AS TO
DATES FOR MOTIONS
FOR FINAL SETTLEMENT APPROVAL
AND ATTORNEYS' FEES**

This Document Relates to:

ALL ACTIONS

WHEREAS, on October 16, 2024, the Court entered its Order Granting Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement (the "Preliminary Approval Order," Dkt. 62); and

1 WHEREAS, the Preliminary Approval Order directs the parties to, *inter alia*, meet and confer
 2 and stipulate to a schedule of dates for certain events in connection with Plaintiffs' forthcoming
 3 motions for final settlement approval and attorneys' fees; and

4 WHEREAS, the parties have met and conferred as directed by the Court.

5 NOW, THEREFORE, the parties stipulate and agree to the following deadlines subject to the
 6 approval of the Court:

Event	Date
Deadline for notice of the settlement to be published and posted consistent with the proposed notice plan	November 6, 2024
Filing deadline for motions for attorneys' fees and expenses	December 6, 2024
Filing deadline for shareholders' objections to the settlement	January 13, 2025
Filing deadline for the parties' replies to shareholder settlement objections	January 27, 2025
Filing deadline for responses to motions for attorneys' fees and expenses	December 13, 2024
Filing deadline for replies to motions for attorneys' fees and expenses	December 20, 2024
Filing deadline for shareholders' objections to motions for attorneys' fees and expenses	January 13, 2025
Filing deadline for the final approval motion	December 6, 2024
Final approval settlement hearing	February 6, 2025

1 Dated: October 23, 2024

Respectfully submitted,

2 By: /s/Gregory M. Nespole
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5 *Attorneys For Nominal Defendant Lyft, Inc. and*
6 *Defendants Logan Green, John Zimmer, Brian*
7 *Roberts, Prashant (Sean) Aggarwal, Jonathan*
8 *Christodoro, Ben Horowitz, Valerie Jarrett,*
9 *David Lawee, Hiroshi Mikitani, Ann Miura-Ko,*
10 *and Mary Agnes (Maggie) Wilderotter*

9 **ECF ATTESTATION**

10 Pursuant to Civil L.R. 5-1(i)(3), the filer attests that concurrence in the filing of this document
11 has been obtained from each of the other signatories thereto.

12 Executed this 23rd day of October in New Rochelle, New York.

13 By: /s/ Gregory M. Nespole
14 Gregory M. Nespole

15 * * *

16 **ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18 Date: 10/24/2024

19 
20 HONORABLE HAYWOOD S. GILLIAM, JR.
21 UNITED STATES DISTRICT JUDGE
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