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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION	MDL No. 3084 CRB
This Document Relates to:	Honorable Charles R. Breyer
M.A. v. Uber Technologies, Inc., et al.	JURY TRIAL DEMANDED
Case No. 3:24-cv-02568-CRB	

FIRST AMENDED SHORT-FORM COMPLAINT

AND DEMAND FOR JURY TRIAL

The Plaintiff named below files this *First Amended Short-Form Complaint and Demand for Jury Trial* against Defendants named below by and through the undersigned counsel. Plaintiff incorporates by reference the allegations contained in *Plaintiffs' Master Long-Form Complaint* in *In Re: Uber Technologies, Inc., Passenger Sexual Assault Litigation,* MDL No. 3084 in the United States District Court for the Northern District of California. Plaintiff files this *First Amended Short-Form Complaint* as permitted by Case Management Order No. 6 of this Court.

Plaintiff selects and indicates by checking-off where requested, the Parties and Causes of Actions specific to this case.

Plaintiff, by and through their undersigned counsel, allege as follows:

I. DESIGNATED FORUM[1]

1. Identify the Federal District Court in which the Plaintiff would have filed in the absence of direct filing:

Northern District of California

("Transferee District Court")

II. IDENTIFICATION OF PARTIES

A. PLAINTIFF

1. *Injured Plaintiff*: Name of the individual who alleges they were sexually assaulted, battered, harassed, or otherwise attacked by an Uber driver with whom they were paired while using the Uber platform:

M.A., an individual

("Plaintiff")

2. At the time of the filing of this *Short-Form Complaint*, Plaintiff resides at:

Olmsted, Cuyahoga County, OH

3. (If applicable) _____ [INSERT NAME OF REPRESENTAIVE] is filing this case in a representative capacity as the [INSERT DESCRIPTOR IE ADMINISTRATOR] of the [INSERT DESCRIPTOR IE ESTATE NAME, ETC], and has authority to act in this representative capacity because [INSERT BASIS FOR AUTHORITY].

B. DEFENDANT(S)

1. Plaintiff names the following Defendants in this action.

☒ UBER TECHNOLOGIES, INC.,[2]

[1] *See* Pretrial Order No. 6, at II(C) (ECF No. 177).

[2] Delaware corporation with a principal place of business in California.

☒ RASIER, LLC,[3]

☒ RASIER-CA, LLC.[4]

☐ OTHER (specify):_____. This defendant's residence is in (specify state): _____.

C. RIDE INFORMATION

1. The Plaintiff was sexually assaulted, harassed, battered, or otherwise attacked by an Uber driver in connection with a ride facilitated on the Uber platform in Cuyahoga County, Ohio on 10/29/2022

2. The Plaintiff was the account holder of the Uber account used to request the relevant ride.

3. The Plaintiff provides the following additional information about the ride:

☒ The Plaintiff hereby incorporates Plaintiff's disclosure of ride information produced pursuant to Pretrial Order No. 5 ¶ 4 on [N/A] or to be produced in compliance with deadlines set forth in Pretrial Order No. 5 ¶ 4, and any amendments or supplements thereto.

☐ The origin of the relevant ride was [STREET ADDRESS, CITY, COUNTY, STATE]. The requested destination of the relevant ride was [STREET ADDRESS, CITY, COUNTY, STATE]. The driver was named [DRIVER NAME].

III. CAUSES OF ACTION ASSERTED

1. The Causes of Action asserted in the *Plaintiffs' Master Long-Form Complaint*, and the allegations with regard thereto in the *Plaintiffs' Master Long-Form Complaint*, are adopted in this *Short-Form Complaint* by reference, except that Plaintiff opts out of and excludes the causes of action

[3] A limited liability company whose sole member, Uber Technologies, Inc., is a citizen of Delaware and California.

[4] A limited liability company whose sole member, Uber Technologies, Inc., is a citizen of Delaware and California.

specified below:

Check any EXCLUDED causes of action	Cause of Action Number	Cause of Action
☐	I	NEGLIGENCE (including Negligent Hiring, Retention, Supervision, and Entrustment)
☐	II	FRAUD AND MISREPRESENTATION
☐	III	NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
☐	IV	COMMON CARRIER'S NON-DELEGABLE DUTY TO PROVIDE SAFE TRANSPORTATION[5]
☐	V	OTHER NON-DELEGABLE DUTIES TO PROVIDE SAFE TRANSPORTATION[6]
☐	VI	VICARIOUS LIABILITY FOR DRIVERS' TORTS - EMPLOYEE
☐	VII	VICARIOUS LIABILITY FOR DRIVERS' TORTS - APPARENT AGENCY
☐	VIII	VICARIOUS LIABILITY FOR DRIVERS' TORTS - RAIFICATION
☐	IX	VICARIOUS LIABILITY FOR DRIVERS' TORTS - Cal. Public Utilities Code S 535
☐	X	STRICT PRODUCTS LIABILITY - DESIGN DEFECT
☐	XI	STRICT PRODUCTS LIABILITY - FAILURE TO WARN
☐	XII	STRICT PRODUCTS LIABILITY - PRODUCT LIABILTY ACTS
☐	XIII	UNFAIR COMPETITION LAW - Cal. Bus. & Prof. Code S 17200 et seq.

VI. ADDITIONAL CAUSES OF ACTION AND/OR ALLEGATIONS

1. Plaintiff asserts the following additional theories against the Defendants designated in paragraph __ above:

[5] This claim is pleaded in the *Plaintiffs' Master Long-Form Complaint* under the laws of eve1y state **except: Arizona, Colorado, District of Columbia, Illinois (**for incidents prior to August 11, 202**3), Michigan, Montana (**for incidents prior to April 23, 2023**), New York, Pennsylvania, Wisconsin, and Wyoming.**

[6] This claim is pleaded in *Plaintiffs' Master Long-Form Complaint* under the laws of eve1y state **except:** District **of Columbia, Michigan, New York, Pennsylvania.**

[N/A]

2. If Plaintiff has additional factual allegations not set forth in *Plaintiffs' Master Long-Form Complaint*, they may be set forth below or in additional pages:

Additional facts will be set forth in Plaintiff Fact Sheet to be submitted to court at a separate date.

WHEREFORE, Plaintiff prays for relief and judgment against Defendants for economic and non-economic compensatory and punitive and exemplary damages, together with interest, costs of suit, attorneys' fees, and all such other relief as the Court deems proper, and such further relief as the Court deems equitable and just, and as set forth in *Plaintiffs' Master Long-Form Complaint*.

JURY DEMAND

Plaintiff hereby demands a trial by jury as to all claims in this action.

Dated: January 3, 2025

By: */s/Sarah Anastasi*
Sarah Anastasi, Esq.
Attorney for Plaintiff