Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street, Suite 2700
San Francisco, CA 94104
Telephone: (415) 439-1625
laura.vartain@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
Christopher D. Cox (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jessica.davidson@kirkland.com
christopher.cox@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Counsel for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

[Additional Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION,	Case No. 3:23-md-03084-CRB
This Document Relates to: All Wave 1 Bellwether Cases	**STIPULATION AND ORDER REGARDING PRODUCTION OF DOCUMENTS IN ADVANCE OF WAVE 1 BELLWETHER DEPOSITIONS** Judge: Hon. Lisa J. Cisneros Courtroom: Courtroom G – 15th Floor

RECITALS

WHEREAS, the parties are interested in facilitating the prompt and efficient completion of Wave 1 bellwether depositions;

WHEREAS, in a joint status report submitted on July 21, 2025 and during the hearing held before the Court on July 25, 2025, the parties presented their respective positions regarding production of documents relating to such depositions a reasonable time before such depositions take place;

WHEREAS, during the hearing held before the Court on July 25, 2025, the Court expressed its view regarding what would constitute a reasonable period of time for production prior to such depositions;

WHEREAS, the parties acknowledge that there are existing requests for documents and information relating to Wave 1 bellwether depositions, which have been the subject of meet-and-confer discussions;

STIPULATION

NOW, THEREFORE, the parties hereby agree and request the Court enter the parties' stipulation as follows:

1. The party tendering the witness will produce at least three business days prior to any scheduled Wave 1 bellwether deposition documents relating to the deposition that have been requested by the deposing party, subject to meet-and-confer discussions.
2. If there is a dispute about the nature or extent of such production, the parties shall raise the dispute with the Court by joint letter no later than two business days prior to the scheduled Wave 1 bellwether deposition.

IT IS SO STIPULATED.

Dated: July 30, 2025

Respectfully submitted,

By: */s/ Laura Vartain Horn*
Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street, Suite 2700
San Francisco, CA 94104
Telephone: (415) 439-1625
laura.vartain@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
Christopher D. Cox (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jessica.davidson@kirkland.com
christopher.cox@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Counsel for Defendants
UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

Dated: July 30, 2025

Respectfully submitted,

By: */s/ Roopal P. Luhana*
Roopal P. Luhana
CHAFFIN LUHANA LLP
600 Third Avenue, Floor 12
New York, NY 10016
Telephone: (888) 480-1123
luhana@chaffinluhana.com

Sarah R. London
GIRARD SHARP LLP
601 California St., Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800
slondon@girardsharp.com

Rachel B. Abrams (SBN 209316)
PEIFFER WOLF CARR KANE

CONWAY & WISE, LLP
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: (415) 426-5641
rabrams@peifferwolf.com

Co-Lead Counsel for Plaintiffs

ATTESTATION

Under Civil Local Rule 5-1(h)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 30, 2025 By: /s/ *Laura Vartain Horn*

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 31, 2025

HON. LISA J. CISNEROS
United States Magistrate Judge