**UNITED STATES DISTRICT COURT**
**NORTHERN DISTRICT OF CALIFORNIA**
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**JOINT CASE MANAGEMENT STATEMENT**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17 Floor (via videoconference)
Date: October 3, 2025
Time: 10:00 a.m.

# JOINT CASE MANAGEMENT STATEMENT

Defendants Uber Technologies, Inc., Rasier, LLC, Rasier-CA, LLC (collectively "Uber"), and Plaintiffs' Co-Lead Counsel (collectively referred to herein as "the Parties"), respectfully provide this Joint Case Management Conference Statement and Proposed Agenda in advance of the Case Management Conference scheduled for October 3, 2025.

## Proposed Agenda

I. **Status of Case Filings**

II. **General Discovery Updates**

III. **Pretrial Conference Timing and Substance**

IV. **Pretrial Procedures**

V. **Trial Schedule and Logistics**

VI. **Topics Concerning PTO 32 and 33**

VII. **Settlement / Mediation**

VIII. **Next Case Management Conference**

## I. STATUS OF CASE FILINGS

### 1. Number of MDL Case Filings

As of September 30, there are 2,679 cases in this MDL, with approximately 168 new filings since the last case management conference.

### 2. Status of JCCP

There are approximately 750 cases pending in the JCCP. The first trial began on September 8, 2025. Plaintiff rested on September 18, Defendants rested on September 24, and the case was submitted to the jury on September 25. On September 30, the jury delivered a defense verdict and found that Uber was negligent, but its negligence was not a substantial factor in causing harm to the Plaintiff. The next trial has not been scheduled yet, but Judge Schulman has indicated that he may try the second bellwether case in early November.

### 3. Other Cases and Proceedings

Defendants have provided a current list of civil actions and government investigations arising from sexual assault on the Uber platform in which Uber is a defendant, attached as Exhibit A.

## II. GENERAL DISCOVERY UPDATES

The deadline for substantial completion of common fact discovery was on June 16 and the deadline for substantial completion of Wave 1 case-specific discovery was on July 16. Common fact discovery and discovery in five of the six Wave 1 cases is largely completed. The parties exchanged expert reports on September 26.

Currently pending before Judge Cisneros are (1) a discovery dispute concerning safety data in Uber's Flack database, ECF 3848, 3914; and (2) a discovery dispute pertaining to Uber's S-RAD Program and the scheduling of a related 30(b)(6) deposition, ECF 4009. The Court has advised it anticipates resolving these issues on the papers, ECF 4039. There is also a 30(b)(6) deposition scheduled for October 1 concerning Uber's transportation network, costs and expenditures, and payments to nonprofits.

PTO 26, as later amended, provided that the "close of discovery" was October 6. Judge Cisneros instructed the parties to make a joint submission by October 7 regarding a cutoff for common fact discovery, ECF 4038.

***Defendants' Position***: To ensure compliance with the Court's trial schedule, it is critical that discovery closes consistent with the currently set-schedule. While most discovery is complete, there are several significant issues that remain subject to disputes pending before Judge Cisneros. Defendants are providing this information for the Court's awareness given the potential impact on the trial schedule and the importance of keeping the schedule on track consistent with the Court's directives.

## III. PRETRIAL CONFERENCE TIMING AND SUBSTANCE

The Court recently granted the parties' stipulation to extend the dates for expert discovery and dispositive/*Daubert* motions. The following schedule applies to the five cases that have substantially completed fact discovery:

- Expert Reports: September 26, 2025
- Rebuttal Reports: October 24, 2025
- Dispositive Motions and Daubert Motions for Experts Who Serve 9/26 Reports: November 10, 2025
- Daubert Motions for Experts

Who Serve Only 10/24 Reports: November 14, 2025

- Dispositive/Daubert Oppositions: December 10, 2025
- Dispositive/Daubert Replies: December 23, 2025

ECF 3978, 3997.

The parties seek guidance on the timing of the pretrial conference. The parties also assume that the pretrial conference (and various deadlines that flow backwards from it) will pertain to the first-scheduled trial (the Jaylynn Dean case) but seek confirmation from the Court.

## IV. PRETRIAL PROCEDURES

The parties seek guidance on the extent to which the remaining pretrial procedures are governed by this District's local rules, as opposed to those in the District of Arizona or the Western District of North Carolina. The parties assume, but ask the Court to confirm, that dispositive and *Daubert* motions will be governed by N.D. Cal. rules and this Court's standing order. Likewise, the parties seek to confirm that procedures (exhibit numbering, jury questionnaire, etc.) will be governed by N.D. Cal. rules and this Court's standing order as opposed to the trial forum's rules.

## V. TRIAL SCHEDULE AND LOGISTICS

The parties seek guidance on the Court's schedule for the Jaylynn Dean case, including the length of trial, the anticipated daily schedule, and whether there will be any dark days. The parties also respectfully request the Court's direction on: (a) who to contact with questions regarding courtroom technology; and (b) the availability of workrooms in the courthouse.

## VI. TOPICS CONCERNING PTO 32 AND 33

The parties seek guidance on administrative matters concerning these PTOs.

### A. *Pro Hac Vice* Requirements

The Western District of North Carolina requires that local counsel file any *pro hac vice* motions and accompany *pro hac vice* counsel to all hearings unless otherwise permitted by the Court. W.D.N.C. L.R. 83.1(b)(1), (c)(2)(A). The parties seek clarification as to whether these requirements apply to the MDL bellwether cases, and if so, request that the Court enter a case management order in WHB 823 and WHB 318 suspending them. The parties additionally seek

guidance on whether to file *pro hac vice* applications in the District of Arizona, which does not require local counsel but does require PHV applications.

**B. Filing Procedures in the MDL and District of Arizona and W.D.N.C**

The parties request the court's guidance on whether it is appropriate to continue to file pleadings in the MDL rather than under the action numbers opened in W.D.N.C.

**VII. SETTLEMENT / MEDIATION**

The parties continue to meet periodically with Judge Andler to discuss the potential for resolution.

**VIII. NEXT CASE MANAGEMENT CONFERENCE**

The next case management conference is set for October 24, 2025 at 10:00am, via videoconference. ECF 1990.

Dated: October 1, 2025

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Dated: October 1, 2025

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**FILER'S ATTESTATION**

I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: October 1, 2025

*/s/ Laura Vartain Horn*
Laura Vartain Horn

# EXHIBIT A

| # | *Case Name* | Case Number | Jurisdiction |
|---|---|---|---|
| 1 | *Doe v. Uber Technologies, Inc., et al.* | 47-CV-23-901221 | AL |
| 2 | *United Financial Casualty Co. v. Uber Technologies Inc., et al.* | 5:24-cv-01065-CLS | AL |
| 3 | *Diamond v. Uber Technologies* | CV2025-025162) | AZ |
| 4 | *P.T., et al v. Uber Technologies, Inc., et al.* | CGC-25-622882 | CA |
| 5 | *Garcia v. Uber Technologies, Inc., et al.* | 25STCV19278 | CA |
| 6 | *A.A. et al. v. Uber Technologies, Inc., et al.* | CGC-25-621863 | CA |
| 7 | *Doe v. Uber Technologies, Inc., et al.* | 24CU010461C | CA |
| 8 | *Molette, Jayden v. Uber Technologies, Inc., et al.* | 25CA006923 | FL |
| 9 | *I.J.R. v. Uber Technologies, Inc., et al.* | 2025012532CA01 | FL |
| 10 | *A.W. v. Uber Technologies, Inc., et al.* | 052025CA032780XXCABC | FL |
| 11 | *JANE DOE EB 399 v. Uber Technologies, Inc, et al.* | 2024-CA-011269-O | FL |
| 12 | *Jane Doe v. v. Uber Technologies, Inc, et al.* | 2025-CA-001579 | FL |
| 13 | *C.C. v. Uber Technologies, Inc., et al.* | CACE24017617 | FL |
| 14 | *Doe v. Uber Technologies, Inc., et al.* | 2024-011285-CA-01 | FL |
| 15 | *Doe v. Uber Technologies, Inc., et al.* | 23-CA-006624 | FL |
| 16 | *Brewer v. Uber Technologies, Inc., et al.* | 25-C-10323-S1 | GA |
| 17 | *S.L. v. Uber Technologies, Inc., et al.* | 25-C-03979-SI | GA |
| 18 | *Bates, Taylor v. Uber Technologies, Inc., et al.* | 25C09424S1 | GA |
| 19 | *Jane Doe 2025 v. v. Uber Technologies, Inc, et al.* | 25-C-02860-S1 | GA |
| 20 | *Doe v. Uber Technologies, Inc., et al.* | 25-C-02725-S1 | GA |
| 21 | *Doe v. Uber Technologies, Inc., et al.* | 24-C-05066-S1 | GA |
| 22 | *Jane Doe WHBE 3 v. Uber Technologies, Inc. et al* | 1CCV240001 560 | HI |
| 23 | *Doe v. Uber Technologies, Inc., et al.* | 2025-L-000836 | IL |
| 24 | *Check v. Uber Technologies, Inc., et al.* | 2484CV00948 | MA |
| 25 | *Farrington v. Uber Technologies, Inc., et al.* | 2383CV00084 | MA |
| 26 | *Scheper v. Uber Technologies, Inc., et al.* | 2484CV01054 | MA |
| 27 | *Doe v. Uber Technologies, Inc., et al.* | 22-013966-CZ | MI |
| 28 | *Jane Doe WHBE 1836 v. Uber Technologies, Inc., et al.* | 2422-CC07864 | MO |
| 29 | *Jane Doe WHBE 302, et al. v. Uber Technologies, Inc., et al.* | 2322-CC01288 | MO |
| 30 | *C.T. v. Uber Technologies, Inc., et al.* | MRSL00172323 | NJ |
| 31 | *Doe v. Uber Technologies, Inc., et al.* | 801980/2022 | NY |
| 32 | *Peterson v. Uber Technologies, Inc., et al.* | 8078592022E | NY |
| 33 | *Ventura v. Uber Technologies, Inc., et al.* | 1517572023 | NY |
| 34 | *Doe v. Uber Technologies, Inc., et al.* | CJ-2023-2352 | OK |
| 35 | *Humes v. Uber Technologies, Inc., et al.* | 24CV52619 | OR |

| # | ***Case Name*** | **Case Number** | **Jurisdiction** |
|---|---|---|---|
| 36 | *K.W. v. Uber Technologies, Inc, et al.* | 25OV12710 | OR |
| 37 | *Doe, Jane v. Uber Technologies, Inc., et al.* | 4:25-cv-04341 | TX |
| 38 | *G.R. v. Uber Technologies Inc., et al.* | C067225E | TX |
| 39 | *Doe v. Uber Technologies, Inc., et al.* | CC-23-05566-C | TX |
| 40 | *Doe v. Uber Technologies, Inc., et al.* | 2023-69932 | TX |
| 41 | *Fernandes v. Uber Technologies, Inc., et al.* | 202515902 | TX |
| 42 | *Jane Doe KGKS 1 v. Uber Technologies, Inc., et al.* | 202457168 | TX |
| 43 | *Jane Doe WHB 1842 v. Uber Technologies, Inc., et al.* | 202462281 | TX |
| 44 | *Johnson v. Uber, et al.* | 2024-24542 | TX |
| 45 | *Doe v. Uber Technologies, Inc., et al.* | DC-2024-CV-0690 | TX |
| 46 | *Doe v. Uber Technologies, Inc., et al.* | CV23 1343 | TX |
| 47 | *Jane Doe WHBE 12 v. Uber Technologies, Inc., et al.* | CC-24-0781 5-E | TX |
| 48 | *Jane Doe v. v. Uber Technologies, Inc, et al.* | 252131718SEA | WA |