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Attorneys for Defendant Lyft, Inc.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

17 **IN RE LYFT, INC. PASSENGER SEXUAL
ASSAULT LITIGATION**

19 This document relates to:
20 ALL ACTIONS

MDL No. 3171

Case No. 26-md-03171-RFL

**JOINT SUBMISSION CONCERNING
APPOINTMENT OF A SPECIAL
SETTLEMENT MASTER**

1 Consistent with the Court’s February 12, 2026 Pretrial Order 1 (ECF 2), the parties jointly sub-
2 mit Fouad Kurdi of Resolutions, LLC as special settlement master for this matter.

3 Kurdi has served as mediator in connection with claims in the Lyft JCCP for several years, origi-
4 nally working with Professor Eric Green before becoming the parties’ primary mediator. The parties
5 believe that his work in that proceeding well suits him to serve as special settlement master here.

6 In addition to his work on Lyft matters, Kurdi recently has mediated disputes involving public-
7 nuisance claims asserted by thousands of public entities against multiple companies, culminating in set-
8 tlements exceeding \$15 billion. He has also mediated complex PFAS-related disputes, including claims
9 asserted by public and private entities against chemical suppliers and industrial operators. In addition to
10 his mediation practice, Kurdi specializes in the administration of complex mass tort trusts. A copy of
11 his *curriculum vitae* is attached as Exhibit A.

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13 The parties intend to confer and submit a proposed order detailing Kurdi’s proposed duties. The
14 parties also are prepared to provide the Court with additional information on Kurdi if helpful.

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16 DATED: March 5, 2026

/s/ Rachel Beth Abrams
Rachel Beth Abrams
PEIFFER WOLF CARR KANE CONWAY & WISE, LLP

Point of Contact Attorney for Plaintiffs
Attorney for Plaintiffs Means, Spano, and Stencel

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20 DATED: March 5, 2026

/s/ David Randall J. Riskin
Beth A. Stewart
David Randall J. Riskin
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FILER ATTESTATION

I am the ECF user who is filing this document. I hereby attest under Civil Local Rule 5-1(i)(3), that each of the other signatories have concurred in the filing of the document.

/s/ David Randall J. Riskin

David Randall J. Riskin

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EXHIBIT A

RESOLUTIONS, LLC

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FOUAD KURDI, PRINCIPAL

Fouad Kurdi specializes in mediating disputes in sprawling multi-party disputes, class actions, and other types of mass litigation. Mr. Kurdi is widely recognized for his ability to navigate highly sensitive negotiations, consistently earning the trust of parties with diverse interests. His approach emphasizes creative problem-solving and impartiality, helping participants reach durable resolutions even in the most contentious cases. He is frequently called upon to mediate matters involving broad public policy implications, demonstrating a commitment to fairness and efficiency throughout the process. Notable examples include:

- Dozens of mediations involving claims asserted by states, local governments, tribes, third-party payors, and hospitals in the opioid litigation;
- Mediation of PFAS-related disputes, including claims asserted by state attorneys general, public water systems, and individuals against chemical suppliers, industrial operators, and other defendants;
- Mediation of thousands of alleged sexual assault claims;
- Mediation of multiple class actions alleging price-fixing, market allocation, and horizontal and vertical restraints of trade, including pharmaceutical cases involving agreements related to the Hatch/Waxman Act, and price-fixing claims asserted against protein producers;
- Mediation of multiple class actions against large software developers and social media companies involving alleged violations of, among other claims, the California Invasion of Privacy Act;
- Mediation of significant mass tort matters involving thousands of alleged design defect and failure-to-warn claims;
- Mediation of several multi-state attorneys general enforcement actions involving alleged violations of consumer protection laws; and
- Mediation of several highly complex bankruptcy disputes involving mass tort liabilities.

In addition to his mediation practice, Mr. Kurdi specializes in the administration of complex bankruptcy trusts. Mr. Kurdi serves (or has served) as Trustee to the Purdue Pharma Master Disbursement Trust; Trustee to the TCE PI Trust; Executive Director to the Takata Airbag Tort Compensation Trust Fund; and advisor to the Insys Victims Restitution Trust. Mr. Kurdi is highly experienced in implementing claim evaluation protocols and complex trust agreements. Passionate about finding creative solutions to the novel issues that often arise in complex trusts, Mr. Kurdi strives to build meaningful and trusting relationships with all stakeholders.

Before joining Resolutions, LLC, Mr. Kurdi served as a litigation and financial restructuring associate at Brown Rudnick LLP, following a clerkship for the Honorable Mary F. Walrath at the United States Bankruptcy Court for the District of Delaware. Mr. Kurdi graduated *cum laude* from Georgia State University's College of Law, where he also completed a master's degree in taxation. Mr. Kurdi also holds a certificate from Harvard Law School's Program on Negotiation after successfully completing an intensive formal course on mediating disputes.