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

17 IN RE: LYFT, INC. PASSENGER
18 SEXUAL ASSAULT LITIGATION

No. 3:26-md-03171-RFL

19 **JOINT STIPULATION AND [PROPOSED]**
20 **ORDER EXTENDING TIME TO FILE**
21 **PRETRIAL ORDERS RELATED TO FACT**
22 **SHEETS AND RIDE RECEIPTS**

21 This Document Relates to:
22 ALL ACTIONS
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JOINT STIPULATION

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2 Plaintiffs in all member cases, by and through Plaintiff Co-Lead Counsel, and Defendant
3 Lyft, Inc. (“Lyft”), by and through undersigned counsel, (collectively, the “Parties”), hereby state
4 that they have met and conferred regarding the current deadline to submit stipulations and proposed
5 orders related to ride receipts (the “Ride Receipt Order”) and fact sheets, including Plaintiff Fact
6 Sheets, Defense Fact Sheets, and a Fact Sheet Implementation Order (the “Fact Sheet Orders”), and
7 hereby stipulate as follows:

8 WHEREAS, the Court’s March 26, 2026 Pretrial Order No. 2 directed the Parties to meet
9 and confer, and to submit Stipulations and Proposed Fact Sheet Orders by May 6, 2026;

10 WHEREAS, the Parties have met and conferred and exchanged drafts of the Fact Sheet
11 Orders;

12 WHEREAS, the Parties’ discussions are ongoing, both as to the form and content of the
13 Fact Sheet Orders, and as to the manner in which fact sheets should be served (i.e., via a discovery
14 platform that facilitates discovery in coordinated proceedings);

15 WHEREAS, the Court previously granted the Parties an extension on the deadline to submit
16 a stipulation and proposed Ride Receipt Order so that the Parties could continue to discuss it in
17 conjunction with the Fact Sheet Orders;

18 WHEREAS, the Parties mutually agree that the meet and confer process on the Ride Receipt
19 Order and Fact Sheet Orders would benefit from additional time to continue discussing the vendor
20 for the discovery platform, and the contents of the Ride Receipt and Fact Sheet Orders to allow the
21 Parties to continue coordinating on and narrowing issues that require the Court’s consideration;

22 WHEREAS, in an effort to facilitate these discussions, and to avoid unnecessary later
23 amendments to the Fact Sheet Orders, the Parties respectfully request the Court extend the time by
24 which the Parties have to submit either (1) Joint Stipulations and Proposed Fact Sheet Orders, or
25 (2) in the event the Parties cannot reach full agreement on such orders, competing proposals with
26 position statements in support thereof, pursuant to Section V of Pretrial Order No. 2 (Dkt. No. 77),
27 to May 12, 2026; and
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1 WHEREAS, this is the Parties' first stipulation extending the Parties' time to submit the
2 Fact Sheet Orders, and the Parties' second stipulation extending the Parties' time to submit the Ride
3 Receipt Order, and the requested extension will not prejudice any party or impact any other existing
4 case deadlines.

5 IT IS THEREFORE STIPULATED AND AGREED by Plaintiffs, by and through Plaintiff
6 Co-Lead Counsel, and Defendant Lyft, by and through undersigned counsel, that the Parties will
7 continue to meet and confer on the draft Ride Receipt Order and Fact Sheet Orders, and will submit
8 either (1) Joint Stipulations and Proposed Ride Receipt and Fact Sheet Orders, or (2) in the event
9 the Parties cannot reach full agreement on such single orders, a joint memorandum regarding their
10 respective positions not to exceed six pages total, which attaches as exhibits redlines for each order
11 showing the differences between their proposals, on or before May 12, 2026.

12 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

13 Dated: May 2, 2026

Respectfully submitted,

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Co-Lead Counsel for Plaintiffs

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

Hon. Rita F. Lin
United States District Court Judge

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SIGNATURE ATTESTATION

I hereby attest that I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 4-1(i)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing’s content and have authorized the filing.

Dated: May 2, 2026

Respectfully submitted,

BARNES & THORNBURG LLP

By: Kristen L. Richer

Kristen L. Richer

Counsel for Defendant Lyft, Inc.