

*[Submitting Counsel Below]*

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

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

Case No. 3:26-MD-03171-RFL

**STIPULATION REGARDING INTERIM  
DISCOVERY DEADLINES**

This Document Relates to:

Judge: HON. LISA J. CISNEROS

ALL ACTIONS

Pursuant to the Court's July 14, 2026 Civil Minutes Entry [Dkt. 278], the Parties hereby submit the following Stipulation re: Interim Discovery Deadlines.

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| <b>July 22, 2026</b><br>("[W]ithin one week of the date this ESI Order Issues")    | <i>Lyft ESI Order Section 10</i><br>f. Within one week of the date this ESI Order issues, the Parties shall meet and confer regarding a deadline for Lyft to decide whether it will use TAR and/or AI to assist in the collection, review, or production of ESI.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>July 24, 2026</b><br>("[W]ithin 7 business days of the entry of this Order")    | <i>Lyft ESI Order Section 7 Disclosures</i><br>To the extent they have not already done so, within 7 business days of the entry of this Order, Defendant will disclose:<br><ul style="list-style-type: none"> <li>(a) the names and job titles of individuals who were placed in litigation hold;</li> <li>(b) the specific names of custodial and non-custodial data sources in Lyft's possession, custody, and control likely to contain potentially relevant Documents and ESI and the exact information each source includes;</li> <li>(c) Lyft's specific and sourced definition of a "custodial file" to enumerate the platform, system or other content, and dates covered as part of litigation holds; and</li> <li>(d) additional third parties likely to possess potentially relevant information in accordance with the Parties' conferrals thus far.</li> </ul><br>[See ESI Order for definition of non-custodial sources]<br>[See ESI Order for definition of custodial sources] |
| <b>July 29, 2026</b><br>("[W]ithin two weeks from the date this ESI Order issues") | <i>Lyft ESI Order Section 10</i><br>The Parties shall file a Stipulation indicating a deadline for Lyft to make its determination about the use of TAR and/or AI to assist in the collection, review, or production of ESI.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>July 31, 2026</b><br>(per agreement to requested extension)                     | Lyft to provide responses and objections to Plaintiffs' written discovery.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>August 6, 2026</b>                                                              | <i>Lyft ESI Order Section 9</i><br>If Defendant is identifying responsive ESI, which is not already known to be responsive, using search terms, the Parties will meet and confer about search terms in English and any other languages used in the Defendant's documents. Before implementing search terms, Defendant will disclose information and meet and confer ... regarding the search platforms to be used, a list of search terms in the exact forms that they will be applied (i.e. as adapted to the operators and syntax of the search                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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|                        | <p>platform), a list of relevant English and foreign language company terminology (or equivalent), all relevant project and code names, code words, acronyms, abbreviations, nicknames, significant or common misspellings of the listed search terms in the collection to be searched, any date filters, or other culling methods.</p> <p>At the same time Defendant discloses the search terms, unless Plaintiffs agree to waive or delay disclosure, Defendant shall disclose:</p> <ol style="list-style-type: none"> <li>1) the number of documents with hits for each term;</li> <li>2) The number of unique documents, i.e. documents which do not have hits for any other, for each term;</li> <li>3) The number of family members, including the documents with hits, of the documents with hits for each term;</li> <li>4) the number of documents being searched;</li> <li>5) the total number of unique documents with search term hits;</li> <li>6) the total number of unique documents with search term hits with their families; and</li> <li>7) the total number of unique documents without search term hits.</li> </ol> |
| <b>August 13, 2026</b> | <p><i>Lyft ESI Order Section 9</i></p> <p>Plaintiffs may propose additional terms or culling parameters. At the same time the Plaintiffs disclose their proposals, they may request that the Defendant provide hit reports for any modified or new terms proposed by Plaintiffs, and Defendant shall promptly respond with that information but may also provide other information.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>August 14, 2026</b> | <p>Plaintiffs to provide Lyft with a list of initial custodial and non-custodial sources to be searched pursuant to the ESI protocol. While Plaintiffs will endeavor to be comprehensive in their identification of such sources, they retain the ability to later identify additional custodial and non-custodial sources to be searched based on information obtained in the discovery process</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>August 24, 2026</b> | <p>Lyft to disclose decision to use TAR or AI for review.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>August 26, 2026</b> | <p>Parties to meet and confer on Objections to Plaintiffs' Written Discovery, if necessary. Any disputed issues will be addressed to the Court at the time of the September Case Management Conference.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>August 27, 2026</b> | <p><i>Lyft ESI Order Section 10</i></p> <p>In the event that Defendant decides to use or apply TAR or AI to assist in the collection, review or production of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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|                                 | <p>records, within 3 days of Defendant's decision and before Defendant has begun using TAR or AI to assist, Defendant shall disclose its intended use of such technolog(ies). Defendant's disclosure shall include:</p> <ul style="list-style-type: none"> <li>i. the AI or TAR application/program/platform ("platform(s)");</li> <li>ii. the name of any vendor(s) involved in the proposed AI or TAR process;</li> <li>iii. documentation of the AI or TAR platform(s);</li> <li>iv. specification of the documents to which AI or TAR will be applied;</li> <li>v. specification of the documents excluded from AI or TAR and the reasons for such exclusion;</li> <li>vi. specification of the documents and training sets used to train the platform(s);</li> <li>vii. specification of the AI and/or TAR workflow, including all steps therein;</li> <li>viii. specification of the training process, including all prompts, templates, instruction sets, or parameter configurations used;</li> <li>ix. Specification of validation and validation criteria; and</li> <li>x. Specification of how recall and prevalence will be estimated</li> </ul> <p>Defendant shall also provide any additional information necessary for Plaintiffs to fully and adequately evaluate the proposal and the underlying technology.</p> <p>After this disclosure, Plaintiffs may request any additional information required for Plaintiff to understand Defendant's proposed use of AI or TAR and the underlying technology and no such request will be unreasonably refused.</p> |
| <p><b>September 3, 2026</b></p> | <p><i>Lyft ESI Order Section 9</i></p> <p>Parties to meet and confer to resolve any disputes about the search terms.</p> <p>Parties also to meet and confer on the order of production for custodial files and any disputes concerning the use of AI or TAR.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| <b>September 10, 2026</b> | Final submission of any disputes concerning search terms, custodians, use of AI or TAR or any related matters to Judge Cisneros for resolution at the Court's earliest convenience. |
| <b>September 30, 2026</b> | Beginning of Rolling Production of Documents by Lyft                                                                                                                                |
| <b>January 4, 2027</b>    | <i>PTO 11</i><br>Lyft's Deadline for Substantial Completion of non-privileged documents responsive to Plaintiffs' Requests for Production that are served by August 1, 2026         |

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

Dated: July 24, 2026

Respectfully submitted,

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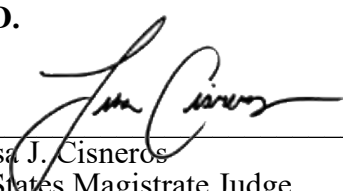
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*Counsel for Defendant Lyft, Inc.*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: July 29, 2026

  
\_\_\_\_\_  
Hon. Lisa J. Cisneros  
United States Magistrate Judge

**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: July 24, 2026

Respectfully submitted,

**WAGSTAFF LAW FIRM**

By: /s/ Aimee Wagstaff  
Aimee Wagstaff

*Counsel for Plaintiffs*