

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: LYFT, INC. PASSENGER
SEXUAL ASSAULT LITIGATION

MDL No. 3171

Case No. 26-md-03171-RFL

This document relates to:
ALL ACTIONS

PRETRIAL ORDER NO. 2

Applications from any lawyer who wanted to be considered for appointment to Plaintiffs' Lead Counsel were due on February 26, 2026. Objections to any applications were due on March 12, 2026.

After a comprehensive hearing, the following is **ORDERED**:

I. PLAINTIFFS' CO-LEAD COUNSEL

Applications for Plaintiffs' Lead Counsel were received from Roopal P. Luhana of Chaffin Luhana, Aimee H. Wagstaff of Wagstaff Law Firm, and Rachel Abrams of Peiffer Wolf Carr Kane Conway & Wise, LLP. No objections were received. Upon consideration of the applications and the responses and presentation during the initial CMC, Roopal P. Luhana, Aimee H. Wagstaff, and Rachel Abrams are appointed as Plaintiffs' Co-Lead Counsel.

All appointments are of a personal nature. Accordingly, each appointee must assume personal responsibility for the performance of their duties, and no other attorneys, including members of an appointee's law firm, may substitute for the appointee in the fulfillment of their exclusive duties, except with prior approval of the Court. The Court may add or replace

appointees on their request, on request of the Plaintiffs' Co-Lead Counsel, or on its own motion, as circumstances warrant.

All appointments are made for a one-year period and will expire on March 25, 2027. Counsel may apply for reappointment a minimum of 30 days before their term expires. Applications for reappointment must detail the nature and scope of the attorney's work on this litigation, including the time and resources that the attorney expended during the previous term.

II. ADDITIONAL LEADERSHIP

Plaintiffs' Co-Lead Counsel are ordered to submit a proposed order outlining their responsibilities, including maintenance of a case website, as well as the responsibilities and membership of the Plaintiffs' Steering Committee, by **April 1, 2026**. Plaintiffs and Defendant are also ordered to submit a proposed order appointing one Liaison Counsel each by **April 1, 2026**. Going forward, Liaison Counsel for both sides shall be responsible for any necessary coordination with the Courtroom Deputy, including filing of an attendance sheet no later than two business days prior to each case management conference. They shall send a joint email to the Courtroom Deputy Angie Meuleman at rflcrd@cand.uscourts.gov to facilitate initial communication.

III. DISCOVERY REFERRAL

Pursuant to Civ. L.R. 72-1, this case is referred for all discovery purposes to Magistrate Judge Lisa J. Cisneros.

IV. SETTLEMENT MASTER

Fouad Kurdi is appointed to facilitate settlement discussions among all parties to this multi-district litigation. The parties shall have an initial check-in with Kurdi no later than **May 13, 2026**.

V. MEET AND CONFER AND PROPOSED ORDERS

The parties shall meet and confer, and by **April 1, 2026** submit a single stipulation and proposed order concerning the following topics:

- i. direct filing, including a process to stipulate to relation if a direct-filed case is

- assigned to another judge;
- ii. plaintiff pseudonymity;
 - iii. setting deadlines for the filing of master and short-form complaints, with the master complaint filed no later than May 8, 2026, and a model short-form complaint filed no later than May 22, 2026;
 - iv. setting the deadline for substantial completion of production of documents previously produced by Lyft in the JCCP as May 1, 2026; and
 - v. an interim protective order to govern only those materials to be produced by May 1.

Additionally, by **April 8, 2026**, the parties shall submit a single stipulation and proposed order concerning ESI preservation and ride receipts.

Finally, by **April 15, 2026**, the parties shall meet and confer concerning the following topics:

- i. ESI and Protective Orders;
- ii. fact sheet formats and a schedule for their exchange;
- iii. a schedule for initial pleadings motions, including whether those motions should concern the master complaint or bellwether cases, or both;
- iv. a deadline for master initial disclosures;
- v. deadlines for discovery, including discovery previously produced by Lyft to government entities (other than grand juries) regarding rideshare sexual assault, as well as expert discovery;
- vi. a target date to meet and confer and submit a proposal to the Court regarding a bellwether protocol, including a target date for bellwether pool selection;
- vii. Settlement Master Kurdi's duties;
- viii. a time and expense protocol for Plaintiffs' counsel; and
- ix. a common benefit protocol and holdback provisions.

By **May 6, 2026**, the parties shall submit a stipulation and proposed order concerning the


topics listed above on which agreement has been reached. If the parties cannot agree on all topics, they shall also file a joint memorandum regarding their respective positions not to exceed 20 pages total, which attaches as exhibits a redline showing the differences between their proposals (if the dispute is over a document) or side-by-side schedules (for deadlines). That same day, the parties shall also file a joint case management statement outlining any additional issues to be addressed.

VI. CASE MANAGEMENT CONFERENCE

The next case management conference will be held on **May 13, 2026, at 1:30 p.m.** in Courtroom 15 at the San Francisco Courthouse.

IT IS SO ORDERED.

Dated: March 26, 2026



RITA F. LIN
United States District Judge