

1 [Submitting Counsel below]

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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

No. 3:26-md-03171-RFL

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**STIPULATION AND ~~[PROPOSED]~~
PRETRIAL ORDER NO. 4: PLAINTIFFS
PROCEEDING UNDER PSEUDONYM**

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14 This Document Relates to:

15 ALL ACTIONS

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1 The Court has determined upon stipulation of the parties that, for purposes of the pre-trial
2 proceedings in all member cases pending before the Court, a Plaintiff's need to proceed
3 anonymously outweighs the prejudice to Lyft, Inc., and to any other defendants in these
4 proceedings, in not disclosing a Plaintiff's identity, and the public's interest in knowing the that
5 identity, in the period before trial. *See Does I thru XXIII v. Advanced Textile Corp.*, 214 F.3d 1058,
6 1068 (9th Cir. 2000). Accordingly, the Court hereby enters the following stipulated order:

7 Any Plaintiff who wishes to proceed anonymously may do so, for purposes of pretrial
8 proceedings in this MDL and in any member case, provided they comply with the following
9 procedures:

- 10 a. Individual complaints shall be filed using Plaintiff's first, and last initial;
- 11 b. Plaintiff agrees to provide their true name to Lyft no later than the earlier of (i) seven days
12 from Lyft's request of such information, and (ii) Plaintiff's production of ride receipt
13 information to Lyft, pursuant to the forthcoming Order of this Court. Lyft agrees that a
14 Plaintiff's true name shall be kept confidential unless otherwise ordered by the Court;
- 15 c. To the greatest extent possible, the parties agree to refer to a Plaintiff by his or her
16 designated pseudonym in all filings. Where impossible, the parties shall jointly request to
17 file a Plaintiff's name under seal.

18 Nothing in this Order shall be construed as (1) authorizing any Plaintiff to proceed
19 anonymously at any trial conducted in these proceedings, or upon remand of any member case from
20 this MDL; or (2) as waiver of Lyft's ability to challenge any Plaintiff's request to do so. Lyft
21 reserves the right to oppose or object to any such request.

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

2 Dated: April 1, 2026

Respectfully submitted,

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: **April 2, 2026**



Hon. Rita F. Lin
United States District Court Judge