

1 [Submitting Counsel below]
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6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8 SAN FRANCISCO DIVISION
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10 IN RE: LYFT, INC. PASSENGER
11 SEXUAL ASSAULT LITIGATION

No. 3:26-md-03171-RFL

12 **STIPULATION AND ~~PROPOSED~~**
13 **PRETRIAL ORDER NO. 5: SCHEDULING**
14 **ORDER REGARDING MASTER AND**
15 **SHORT FORM COMPLAINTS**

14 This Document Relates to:
15 ALL ACTIONS
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1 Pursuant to the Court’s March 26, 2026 Pretrial Order No. 2 and following the Parties’
2 discussions with the Court during the March 25, 2026 Initial Case Management Conference,
3 Plaintiffs in all member cases, through Plaintiff Co-Lead Counsel, and Defendant Lyft, Inc.
4 (“Lyft”), through counsel, (collectively, the “Parties”), have conferred and hereby agree to the
5 following:

- 6 • Plaintiffs will file the Long Form Master Complaint no later than May 8, 2026. The
7 Master Complaint shall be applicable, as adopted by a plaintiff’s Short Form Complaint,
8 to all current and future cases, whether they are transferred to or directly filed in this
9 MDL.
- 10 • The Parties will submit a joint proposed model Short Form Complaint and
11 Implementation Order for the Short Form Complaints no later than May 22, 2026. If the
12 Parties are unable to provide a joint proposal, they shall provide a single submission
13 showing the differences between their proposals together with a joint memorandum
14 regarding their respective positions not to exceed ten pages per side. Once entered by
15 the Court, the Short Form Complaint shall be used by all current and future member
16 cases in this MDL proceeding whether they are transferred to or directly filed in this
17 MDL.

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

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21 Dated: April 1, 2026

Respectfully submitted,

22 By: /s/ Rachel B. Abrams

Rachel B. Abrams (SBN 209316)

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: **April 2, 2026**



Hon. Rita F. Lin
United States District Court Judge