

1 [Submitting counsel below]
2
3
4
5

6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8 SAN FRANCISCO DIVISION
9

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

No. 3:26-md-03171-RFL

**JOINT CASE MANAGEMENT
STATEMENT AND PROPOSED AGENDA**

12 This Document Relates to:

13 All Cases
14
15
16

Date: May 13, 2026
Time: 1:30 P.M.

Judge: Hon. Rita F. Lin
Courtroom: 15 – 18th Floor

17 ///

18 ///

19 ///
20
21
22
23
24
25
26
27
28

1 As directed by the Court in Pretrial Order No. 2 (ECF 77), counsel for Defendant Lyft, Inc.
2 (“Lyft”) and Plaintiffs’ Co-Lead Counsel (“Plaintiffs”) (collectively referred to herein as the
3 “Parties”) respectfully provide this Joint Case Management Statement and Proposed Agenda in
4 advance of the May 13, 2026 Case Management Conference.

5 **PROPOSED AGENDA**

- 6 **1. Status of Plaintiffs’ Case Filings**
7 **2. Additional Pre-trial Orders**
8 **3. Case Website**
9 **4. Scheduling**

10
11 **I. STATUS OF PLAINTIFFS’ CASE FILINGS**

12 **Number of Case Filings**

13 As of May 5, 2026, there are 54 cases in this MDL, and approximately 1,970 plaintiffs
14 coordinated in the JCCP.

15 **JCCP Trial**

16 Opening statements in the first Lyft JCCP bellwether trial are set for September 30, 2026.

17 **II. PRE-TRIAL ORDERS**

18 Plaintiffs and Lyft have jointly submitted for the Court’s consideration earlier today the
19 following proposed stipulated Pretrial Orders:

- 20 • Appointment of Fouad Kurdi as Special Settlement Master (ECF 137)
21 • Time and Expense Protocol for Plaintiffs’ Counsel (ECF 139)

22 Plaintiffs and Lyft are continuing to confer regarding a Ride Receipts Order and Fact Sheets,
23 and will submit their proposals on May 11, 2026, in accordance with this Court’s Order (ECF 126).

24 Finally, the remaining topics the Court directed the Parties to address in PTO 2 are at issue in the
25 Parties’ joint memorandum addressing their disputes, being submitted today.

26 **III. CASE WEBSITE**

27 Plaintiffs Leadership Counsel has created a Lyft MDL case website, which will be updated
28 with relevant litigation information and Orders. The website is: <https://lyftsexualassaultmdl.com/>.

1 **IV. SCHEDULING**

2 The Parties agree that scheduling monthly Case Management Conferences is advisable.
3 Having reviewed the Court's calendar, and in accordance with our understanding of the Court's
4 preference to hold case management conferences on Wednesdays, the Parties believe the following
5 dates are available for the next few conferences:

- 6
- 7 • June 17, 2026
 - 8 • June 24, 2026
 - 9 • July 15, 2026
 - 10 • August 5, 2026
 - 11 • August 19, 2026
 - 12 • August 26, 2026
 - 13 • September 2, 2026

14 Should the Court wish to conference this MDL on days other than Wednesdays, the Parties
15 will confer further about additional availability.

16 Dated: May 6, 2026

17 Respectfully submitted,

18 By: /s/ Rachel B. Abrams

19 Rachel B. Abrams (SBN 209316)
20 **PEIFFER WOLF CARR KANE**
21 **CONWAY & WISE, LLP**
22 555 Montgomery Street, Suite 820
23 San Francisco, CA 94111
24 Telephone: (415) 426-5641
25 Facsimile: (415) 840-9435
26 rabrams@peifferwolf.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

By: /s/ Roopal P. Luhana
Roopal P. Luhana
CHAFFIN LUHANA LLP
600 Third Avenue, 12th Floor
New York, NY 10016
Telephone: (888) 480-1123
Facsimile: (888) 499-1123
luhana@chaffinluhana.com

By: /s/ Aimee Wagstaff
Aimee Wagstaff
WAGSTAFF LAW FIRM
940 N. Lincoln Street
Denver, CO 80203
Telephone: (720) 255-7623
awagstaff@wagstafflawfirm.com

Co-Lead Counsel Applicants for Plaintiffs

By: /s/ Kristen Richer
Kristen L. Richer (SBN 315883)
BARNES & THORNBURG LLP
2029 Century Park East, Ste. 300
Los Angeles, CA 90067
Telephone: (310) 284-3880
Facsimile: (310) 284-3894
kricher@btlaw.com

*Defense Liaison Counsel and
Counsel for Defendant Lyft, Inc.*

Nadine S. Kohane (admitted *pro hac vice*)
BARNES & THORNBURG LLP
390 Madison Ave., 12th Floor
New York, NY 10017
Telephone: (646) 746-2000
Facsimile: (646) 746-2001
nkohane@btlaw.com

Beth A. Stewart (admitted *pro hac vice*)
David Randall J. Riskin (admitted *pro hac vice*)
WILLIAMS & CONNOLLY LLP
680 Maine Avenue, S.W.
Washington, DC 20024
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
bstewart@wc.com
driskin@wc.com

Counsel for Defendant Lyft, Inc.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 6, 2026

Respectfully submitted,

By: /s/ Rachel B. Abrams
Rachel B. Abrams