

1 [Submitting counsel below]
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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

MDL No. 3171

No. 3:26-md-03171-RFL

12
13 This Document Relates to:
14 All Cases
15

**~~PROPOSED~~ PRETRIAL ORDER NO. 15:
IMPLEMENTATION OF MASTER AND
SHORT FORM COMPLAINTS**

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1 **Plaintiffs’ proposed version of the short-form complaint is adopted. For efficiency, it**
2 **makes sense to incorporate by reference the ride receipt information. Additionally, at this**
3 **early stage of the litigation, an individual Plaintiff need not make comprehensive allegations**
4 **beyond detailing the alleged incident and incorporating by reference the Master Long-Form**
5 **Complaint. Such comprehensive allegations are properly reserved for individual Plaintiffs’**
6 **long-form complaints.**

7 **To correct apparent typos, the Court added “not” after “excludes the causes of action”**
8 **in Section III(1) of the template short-form complaint; renumbered the causes of action in**
9 **the associated table; and added “beyond those” after “Defendant(s)” in Section VI(1).**

10 This Stipulated Order shall govern all cases in MDL No. 3171. In light of the number of
11 complaints filed and anticipated in this Multidistrict Litigation, the inefficiency of drafting
12 individual long-form Complaints and Answers to those Complaints, and in order to streamline the
13 process for the Court’s consideration of dispositive motions, the Parties have agreed to the use of
14 master pleadings. This Order sets forth the procedures governing this process.

15 **I. APPLICABILITY OF ORDER**

16 1. This Order applies to all cases currently pending in MDL No. 3171 and to all actions
17 that have or will be filed in, transferred, removed or otherwise assigned, to this proceeding. This
18 Order is binding on all Parties and their counsel in all such cases. This Order is not intended to alter
19 the applicable provisions of the Federal Rules of Civil Procedure or the Local Rules of this Court,
20 except as specified herein or in any subsequent Pretrial Order.

21 **II. MASTER PLEADINGS**

22 2. On May 8, 2026, the Plaintiffs’ Co-Lead Counsel and Plaintiffs Steering Committee
23 (hereinafter “PSC”) filed Plaintiffs’ Master Long-Form Complaint (“Master Complaint”) on behalf
24 of all Plaintiffs in this MDL (filed at Dkt. No. 175).

25 3. Attached as **EXHIBIT A** is a template Short-Form Complaint (“SFC”). The SFC is
26 an abbreviated form that each individual Plaintiff will complete to indicate their individual claims,
27 adopt the factual allegations set forth in the Master Complaint as the basis for those claims, and
28 provide additional factual allegations, if any. Through this process, all allegations set forth in the

1 Master Complaint shall be deemed pleaded against all relevant parties named in each SFC.

2 4. In accordance with the requirements set forth in Pretrial Order No. 3: Direct Filing
3 (Dkt. No. 85), each SFC filed in any case filed directly in or removed to this MDL shall indicate
4 the federal district in which the individual Plaintiff originally filed or would originally have filed
5 his or her complaint. Similarly, each SFC filed in a case transferred to this MDL via a conditional
6 transfer order from the Judicial Panel on Multidistrict Litigation shall set forth the federal district
7 in which the case was originally filed.

8 5. By stipulating to the procedures for filing SFCs, Lyft shall not be deemed to agree
9 or admit to the allegations set forth in the Master Complaint, or the SFC template, nor to any facts
10 or claims that may be added or asserted by any individual who completes the SFC template. No
11 Defendant shall be deemed to have waived its right to dispute the legal validity and/or sufficiency
12 of the claims and allegations set forth in the Master Complaint and SFCs. Defendants shall be
13 deemed to have expressly reserved any and all rights, defenses, affirmative defenses, or objections
14 they may have, including but not limited to challenges regarding subject matter, venue, forum,
15 personal jurisdiction, and/or service of process.

16 6. Each Plaintiff with a case pending in this MDL as of the date of this Order shall
17 serve and file a SFC within fourteen (14) days of entry of this Order, naming each diverse
18 Defendant against whom Plaintiff is asserting claims by placing a check-mark in the box next to
19 the diverse Defendant's name to select each applicable diverse Defendant against whom claims are
20 alleged.

21 7. Any future Plaintiff may file a SFC directly into the MDL pursuant to Pretrial Order
22 No. 3.

23 8. Each Plaintiff with a case transferred into this MDL after the date of this Order shall
24 serve and file a SFC, within fourteen (14) days of transfer into this MDL, naming each diverse
25 Defendant against whom Plaintiff is asserting claims by placing a check-mark in the box next to
26 the diverse Defendant's name to select each applicable diverse Defendant against whom claims are
27 alleged.

28 9. Plaintiff should only select Defendants (by placing a check-mark next to the

1 Defendant’s name) if diversity exists. The Court expects that each Plaintiff and their counsel will
2 make a carefully individualized evaluation of the basis for naming appropriate Defendants in the
3 filed SFC.

4 10. To the extent a Plaintiff wishes to amend his or her SFC, or to voluntarily dismiss a
5 party from this action, any such amendment or dismissal shall be done in a manner consistent with
6 the Federal Rules of Civil Procedure, and with any current or future order of the Court.

7 11. For purposes of calculating the statutes of limitation and/or repose as to previously
8 filed, still-pending cases, the date that the Plaintiff first started their action by filing an original
9 complaint—or other pleading in either state or federal court—against a given Defendant shall be
10 deemed the relevant date of first filing as to that Defendant (*i.e.*, not the later date when the SFC
11 was filed).

12 12. All provisions of this order that apply to the Master Complaint apply with equal
13 force and effect to any Amended Master Complaints. Barring agreement of the Parties or order of
14 the Court, all SFCs filed or to be filed in this MDL are deemed to incorporate any Amended Master
15 Complaints without the need for any Plaintiff to take action to amend their SFC upon the filing of
16 an Amended Master Complaint. Any claims or causes of action dismissed from the Master
17 Complaint, and therefore not contained within a later Amended Master Complaint, shall be deemed
18 dismissed from any SFC which had incorporated the Master Complaint.

19 **III. RESPONSE TO MASTER COMPLAINT AND SHORT-FORM COMPLAINTS**

20 13. To eliminate potential delays and to promote judicial efficiency with respect to the
21 administration of this MDL proceedings, any Defendant named in the Master Complaint need not
22 answer or otherwise respond to the Master Complaint, nor to any filed SFC, until ordered to do so
23 by the Court.

24 **IV. COMPLETION, SERVICE AND FILING OF SFCs**

25 14. The Parties have jointly proposed Rubris, Inc.’s (“Rubris”) platform to serve as the
26 litigation-management database for this litigation. The Court adopts the Rubris platform for this
27 purpose.

28 15. For Plaintiffs whose cases are pending in this MDL at the time of entry of this Order,

1 Plaintiffs must complete all SFCs using the Rubris platform, which the Parties have also agreed
2 will be the online platform for service and exchange of Ride Receipt Disclosures and Fact Sheets.

3 16. Defendants have stipulated to e-mail service of SFCs under Pretrial Order No. 3
4 (Dkt. No. 85). A Plaintiff serving a SFC pursuant to Pretrial Order No. 3 is not required to serve a
5 copy of the Master Complaint by e-mail upon Defendants.

6 17. For all SFCs filed after the date of this Order, Plaintiffs' counsel shall use the Rubris
7 platform (<https://app.rubris.com/>) to populate, generate, download, and serve such pleadings and
8 related documents in accordance with this Order and any applicable Case Management Orders,
9 including Pretrial Order No. 3.

10 18. Plaintiffs' counsel shall file documents generated through Rubris with the Court via
11 CM/ECF in accordance with the Federal Rules of Civil Procedure, the Local Rules, and any
12 applicable Case Management Orders, including Pretrial Order No. 3.

13 19. SFCs shall not be filed on the master MDL docket, and shall only be filed on the
14 docket of a Plaintiff's individual member case.

15 20. Service through the Rubris Crosslink platform shall constitute service on all counsel
16 registered in the platform to the extent authorized by the Federal Rules of Civil Procedure, the
17 Local Rules, and any Orders of this Court. Nothing herein alters any requirement for service
18 through CM/ECF or any other method otherwise required by applicable rule or order.

19 21. Plaintiffs' counsel filing any Short Form Complaint or other designated pleading
20 after the date of this Order must establish an account with Rubris by requesting access via e-mail
21 to Support@rubris.com, using the subject line: "[Litigation Name] Crosslink Access Request." The
22 request shall include the name, law firm, and e-mail address of each individual requiring access to
23 the Rubris platform, as well as the name of the attorney or law firm representative who will serve
24 as the administrator for the law firm's account.

25 22. Plaintiffs' counsel shall ensure that all filings comply with the applicable Local
26 Rules, Federal Rules of Civil Procedure, and Orders of this Court.

27 **V. FAILURE TO FILE SHORT-FORM COMPLAINT**

28 23. In the event a Plaintiff fails to file a SFC by the deadlines set forth in this Order,

1 Defendants shall advise Plaintiff's counsel of the failure to comply. Any such Plaintiff shall have
2 seven (7) days from receipt of notice from any Defendant to comply with this Order. In the event
3 the Plaintiff fails to comply, Defendants may seek dismissal of the Plaintiff's case, or other such
4 relief as the Court may deem appropriate, by filing a letter brief to the Court on the individual
5 member case docket and the master MDL docket. Plaintiff will have seven (7) days to file a letter
6 brief in response, and Defendants will have five (5) business days to file a letter reply. In no event
7 shall any such letter brief exceed three single-spaced pages.

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10 Respectfully submitted,

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 8, 2026


Hon. Rita F. Lin
United States District Judge