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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: LYFT, INC., PASSENGER SEXUAL ASSAULT LITIGATION	3:26-md-03171-RFL
This Document Relates to:  (XX), an individual	Honorable Rita F. Lin  JURY TRIAL DEMANDED

**SHORT-FORM COMPLAINT AND DEMAND FOR JURY TRIAL**

The Plaintiff named below files this *Short-Form Complaint and Demand for Jury Trial* against Defendant named below by and through the undersigned counsel. Plaintiff incorporates by reference the allegations contained in *Plaintiffs’ Master Long-Form Complaint in In Re Lyft, Inc., Passenger Sexual Assault Litigation*, MDL No. 3171 in the United States District Court for the Northern District of California. Plaintiff files this *Short-Form Complaint* as permitted by Case Management Order No. 5 of this Court.

Plaintiff selects and indicates by checking-off where requested, the Parties and Causes of Actions specific to this case.

Plaintiff, by and through their undersigned counsel, allege as follows:

**I. DESIGNATED FORUM<sup>1</sup>**

- This complaint is filed pursuant to Pretrial Order No. 3: Direct Filing. Plaintiff hereby designates the United States District Court for the \_\_\_\_\_ as

<sup>1</sup> See Pretrial Order No. 3 (ECF No. 85).

1 Plaintiff's home venue as this case may have originally been filed there because:

- 2  Plaintiff currently resides in \_\_\_\_\_ (city), \_\_\_\_\_ (state);
- 3  Plaintiff's at-issue ride and claimed assault is alleged to have occurred in
- 4 \_\_\_\_\_ (city), \_\_\_\_\_ (state);
- 5  A substantial portion of other events or omissions giving rise to Plaintiff's claim
- 6 occurred there.

- 7  This case was originally filed in the United States District Court for the \_\_\_\_\_
- 8 \_\_\_\_\_ and was transferred to this Court via Transfer Order
- 9 No. \_\_\_\_\_ by the Judicial Panel on Multidistrict Litigation.

10 **II. IDENTIFICATION OF PARTIES**

11 **A. PLAINTIFF**

12 1. *Injured Plaintiff*: Name of the individual who alleges they were sexually assaulted,

13 battered, harassed, or otherwise attacked by a Lyft driver with whom they were

14 paired while using the Lyft platform: \_\_\_\_\_.

- 15  *Check if applicable*: Plaintiff is filing under Pseudonym Pursuant to
- 16 Pretrial Order No. 4: Plaintiffs Proceeding Under Pseudonym.

17 2. At the time of the filing of this *Short-Form Complaint*, Plaintiff resides at (City,

18 County, State).

19 3. (If applicable) \_\_\_\_\_ [INSERT NAME OF

20 REPRESENTATIVE] is filing this case in a representative capacity as the

21 [INSERT DESCRIPTOR I.E. ADMINISTRATOR ETC.] of the [INSERT

22 DESCRIPTOR I.E. ESTATE OF NAME, ETC.], and has authority to act in this

23 representative capacity because [INSERT BASIS FOR AUTHORITY].

24 **B. DEFENDANT**

25 1. Plaintiff names the following Defendant(s) in this action.

26 **[BEFORE PROCEEDING - PLEASE CAREFULLY READ AND CONSIDER THE**

27 **PLACES OF INCORPORATION AND PRINCIPAL PLACE OF BUSINESS OR**

28 **RESIDENCE OF EACH DEFENDANT BEFORE SELECTING TO ENSURE THAT YOU**

**ARE NOT NAMING ANY DEFENDANTS FROM THE SAME STATE AS THE**

**PLAINTIFF. THE PLACE OF INCORPORATION, PRINCIPAL PLACE OF BUSINESS**

**OR RESIDENCE OF EACH DEFENDANT IS IN THE FOOTNOTES FOR YOUR CONVENIENCE]:**

LYFT, INC.;<sup>2</sup>

OTHER (specify): \_\_\_\_\_ . This defendant’s residence is in (specify state): \_\_\_\_\_ .

**C. RIDE INFORMATION**

1. The Plaintiff was sexually assaulted, harassed, battered, or otherwise attacked by a Lyft driver in connection with a ride facilitated on the Lyft platform in (County, State) on (Date of Incident).

2. The Plaintiff (Was/Was Not) the account holder of the Lyft account used to request the relevant ride.

3. Plaintiff provides the following additional information about the ride: **[PLEASE SELECT/COMPLETE ONE]**

The Plaintiff hereby incorporates Plaintiff’s Ride Receipt and disclosure of ride information produced pursuant to Pretrial Order No. 14, Exhibit 1, and any amendments or supplements thereto.

The Plaintiff hereby incorporates Plaintiff’s disclosure of ride information produced pursuant to Pretrial Order No. 14, Exhibit 2, and any amendments or supplements thereto.

**III. CAUSES OF ACTION ASSERTED**

1. The Causes of Action asserted in the *Plaintiffs’ Master Long-Form Complaint*, and the allegations with regard thereto in the *Plaintiffs’ Master Long-Form Complaint*, are adopted in this *Short-Form Complaint* by reference, except that Plaintiff opts out of and excludes the causes of action not specified below:<sup>3</sup>

<sup>2</sup> Delaware corporation with a principal place of business in California.

<sup>3</sup> Throughout the Master Complaint, certain states are excluded from certain counts; however, nothing in the Master Complaint waives any individual’s claims. Therefore, any individual may add in this Short Form Complaint any cause of action under any state’s laws.

Check all causes of action asserted by Plaintiff in this Case	Cause of Action Number	Cause of Action
<input type="checkbox"/>	I	NEGLIGENCE (including Negligent Hiring, Retention, Supervision, and Entrustment)
<input type="checkbox"/>	II	FRAUD AND MISREPRESENTATION
<input type="checkbox"/>	III	NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
<input type="checkbox"/>	IV	COMMON CARRIER’S NON-DELEGABLE DUTY TO PROVIDE SAFE TRANSPORTATION <sup>4</sup>
<input type="checkbox"/>	V	VICARIOUS LIABILITY FOR DRIVERS’ TORTS – EMPLOYEE <sup>5</sup>
<input type="checkbox"/>	VI	VICARIOUS LIABILITY FOR DRIVERS’ TORTS – APPARENT AGENCY
<input type="checkbox"/>	VII	VICARIOUS LIABILITY FOR DRIVERS’ TORTS – RATIFICATION
<input type="checkbox"/>	VIII	STRICT PRODUCTS LIABILITY – DESIGN DEFECT
<input type="checkbox"/>	IX	STRICT PRODUCTS LIABILITY – FAILURE TO WARN
<input type="checkbox"/>	X	STRICT PRODUCTS LIABILITY – PRODUCT LIABILITY ACTS

**VI. ADDITIONAL CAUSES OF ACTION AND/OR ALLEGATIONS**

*NOTE:* If Plaintiff wants to allege additional Cause(s) of Action other those selected in Section III(1), the specific facts supporting any such additional Cause(s) of Action, must be pled in a manner complying with the requirements of the Federal Rules of Civil Procedure (see paragraph VI.1, VI.2).

<sup>4</sup> This claim is pleaded in the *Plaintiffs’ Master Long-Form Complaint* under the laws of every state **except: Arizona, Colorado, District of Columbia, Illinois** (for incidents prior to August 11, 2023), **Michigan, Montana** (for incidents prior to April 23, 2023), **New York, Pennsylvania, Wisconsin, and Wyoming.**

<sup>5</sup> This claim is pleaded in the *Plaintiffs’ Master Long-Form Complaint* under the laws of every state and territory **except: District of Columbia, Connecticut, Michigan, Nevada, New York, Oklahoma, Pennsylvania, Tennessee, Texas, Utah, West Virginia, and Wyoming.**

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1. Plaintiff asserts the following additional theories against the Defendant(s) beyond those designated in paragraph III (1) above:

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2. If Plaintiff has additional factual allegations not set forth in *Plaintiffs' Master Long-Form Complaint*, they may be set forth below or in additional pages.

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**WHEREFORE**, Plaintiff prays for relief and judgment against Defendant(s) for economic and non-economic compensatory and punitive and exemplary damages, together with interest, costs of suit, attorneys' fees, and all such other relief as the Court deems proper, and such further relief as the Court deems equitable and just, and as set forth in *Plaintiffs' Master Long-Form Complaint*.

**JURY DEMAND**

Plaintiff hereby demands a trial by jury as to all claims in this action.

Dated: \_\_\_\_\_

**[INSERT SIGNATURE]**