

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: LYFT, INC. PASSENGER
SEXUAL ASSAULT LITIGATION

No. 3:26-md-03171-RFL

DEFENDANT FACT SHEET

This Document Relates to:

ALL ACTIONS

Pursuant to the Fact Sheet Implementation Order entered in the above-captioned litigation, a completed Defendant Fact Sheet (“DFS”) shall be provided for each Plaintiff.

Lyft must provide information that is true and correct to the best of Lyft’s knowledge. Lyft is under an obligation to supplement these responses consistent with the Federal Rules of Civil Procedure. In the event the DFS does not provide Lyft with enough space for it to complete its responses or answers please attach additional sheets. The information in the DFS may, at Lyft’s discretion, be provided by reference to the Ride Receipt or other documentation. Please identify any documents that Lyft is producing as responsive to a question or request. Please do not leave any questions unanswered or blank except as allowed by the instructions below.

I. DEFINITIONS

The following definitions shall apply to this DFS:

“Communications,” as used herein, includes but is not limited to ZenDesk ticket communications; voicemail recordings; recorded calls; and other messages and communications, to the extent available.¹

“Driver,” unless otherwise specified, refers to the person with registered access to the Driver App who was identified by the Lyft App as the driver during the Subject Trip.

“Incident” refers to all events that Plaintiff alleges, in the complaint filed in this action and/or in Plaintiff’s Fact Sheet, constituted sexual misconduct or assault against Plaintiff.

“Plaintiff” means the allegedly injured party who has filed the complaint in this action, provided

¹ For avoidance of any doubt, nothing in the definition of “Communications” shall obligate Lyft to independently search custodial files for information responsive to this Fact Sheet, and production of any “Communications” as contemplated herein shall be limited to materials attached, linked to, or incorporated into the relevant Zendesk Ticket(s) available to Lyft.

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that if the Plaintiff has filed the complaint on behalf of another (e.g., a decedent or a minor), then “Plaintiff” shall refer to the person on whose behalf the lawsuit was filed.

“Ride Receipt” means the standard trip summary and payment receipt generated by Lyft, summarizing information related to the Subject Trip, including e.g., the map snapshot, the start and end date and time, the location that the Plaintiff entered the vehicle, the end location, the name (or first name) of the Driver, and a description of the vehicle (though the appearance and information on the receipt may vary depending on when and where the trip occurred).

“Subject Trip” means the ride or trip the Plaintiff has identified as connected with Plaintiff’s legal claims in the above captioned lawsuit.

“Ticket” as used herein means a customer support interaction or series of related customer support interactions (including but not limited to those which Lyft sent, received, tracked, or organized via Lyft’s Zendesk software or program, or any other software and/or program). Production of a Ticket, where required by this form, must include production of all information attached or linked to the Ticket, to the extent available, including but not limited to comments, names of Lyft’s personnel reflected in the tickets, and all Communications connected with the Ticket as well as the map snapshot and GPS data where required below. For Tickets unrelated to the Subject Trip, Lyft must include production of all information attached or linked to the Ticket, to the extent available, including but not limited to comments, names of Lyft’s personnel reflected in the tickets, and all Communications connected with the Ticket, but need only produce the linked map snapshot and GPS data if the Ticket involves a report of a deviation from the designated route, early end to the ride, or unscheduled stop(s) during the ride. For Tickets unrelated to the Subject Trip, Lyft shall not be required to produce links or information specifically related to the rider including, but not limited to, the rider TOM profile. For all Tickets, Lyft shall not be required to produce information from links to publicly available webpages (e.g., Lyft’s general Twitter page or a help center) except where such link(s) pertain(s) to Communications about the Ticket or underlying Incident.

“Lyft,” “You,” “Your” or “Yours” includes Lyft, Inc. and its predecessors.

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I. CASE INFORMATION

1. Case Number.

II. PLAINTIFF INFORMATION

2. Has Lyft identified an account for Plaintiff (Yes/No)?

If Your answer to the above question is “Yes,” please answer the following:

- a. What was the rider unique identifying number for Plaintiff?
 - b. What was the date of Plaintiff’s first trip request?
 - c. What was the date of Plaintiff’s last trip request?
 - d. What was Plaintiff’s total number of Lyft trips?
3. Has Plaintiff ever been a driver on the Lyft Platform (Yes/No)?

If Your answer to the above question is “Yes,” please answer the following:

- a. What was the date of Plaintiff’s first requested ride as a driver?
- b. What was the date of Plaintiff’s last requested ride as a driver?
- c. What was Plaintiff’s total number of requested rides as a driver?

III. LYFT TRIP INFORMATION

4. Provide the trip identifying number used by Lyft to identify the Subject Trip.
5. Produce (if available) the trip map for the Subject Trip displaying (to the extent available) Route Breakdown including the date, time, and location where the Subject Trip was requested by Rider, accepted by Driver, began and ended, the Driver acceptance location, the map box showing the actual route, and, if applicable, the time and location the trip was cancelled.

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6. For the Subject Trip, please provide GPS data in Lyft's possession, beginning with the time of the accepted ride until one hour after the Subject Ride was ended, to the extent available.
7. Was the Subject Trip a Shared Ride (i.e., a ride in which multiple riders requested a Lyft ride) (Yes/No)?
8. If the Subject Trip was a Shared Ride, were any other passengers picked up (Yes/No)?

IV. DRIVER INFORMATION

9. Provide the full name of the Driver that Lyft has on file.
10. Provide the Date of Birth of the Driver that Lyft has on file.
11. Provide the last two digits of the Driver's Social Security number.
12. Provide the Driver's unique identifying number used by Lyft.
13. Provide the driver's license number for the Driver.
14. Provide the last mailing address of the Driver on file for Lyft.
15. Was the person driving during the Subject Trip the same person identified by Lyft on the Ride Receipt (Yes/No)?
 - a. If your answer to the above question is "No," please state (if known) the Driver's license number, last known address, date of birth, and the last two digits of the SSN of the person who was actually driving during the Subject Trip.
16. Was the Vehicle used during the Subject Trip the same vehicle identified by Lyft on the Ride Receipt (Yes/No)?
 - a. If your answer to the above question is "No," What was the license plate number (if known) of the vehicle actually used during the Subject Trip?
17. Produce all Background Check Results in Your possession conducted on the Driver that can be pulled and produced, including but not limited to Background Check Results obtained from Checkr, FirstAdvantage, and/or Sterling.

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18. To the extent available, provide documents or information sufficient to show the following information concerning the Driver: the date(s) and time(s) the Driver applied to drive on the Lyft Platform; the date(s) and time(s) the Driver was approved to Drive on the Lyft Platform; the date and time the Driver was permanently deactivated; and, information reflecting any other changes in Driver activation status (e.g., temporary deactivation and/or reactivation) by Lyft.
19. Produce a complete log of the Terms of Service the Driver accepted with Lyft, including the date and time each Agreement was accepted (if known).
20. Produce a complete log setting forth each ride requested of the Driver, including the Driver's name, ride status, ride type, and date ride was requested for the entire time period the Driver was a driver on the Lyft platform.
21. Produce all Tickets for the Driver which relate to any of the following categories of conduct: (1) Sexual Assault; (2) reports of a Vehicle Crash or Claim involving injury to the passenger or driver of the other vehicle involved in the accident, (3) Theft or Robbery, (4) Sexual Misconduct, (5) Physical Altercation, (6) Verbal Altercations involving yelling or threats to the passenger, (7) Substance Abuse, (8) a rider report about Inappropriate Post-Trip Contact, (9) Inquiries from Law Enforcement or Other Investigative Agencies regarding the Driver, (10) reports that the Driver who picked up a given passenger was not the same person as the individual identified in the Driver profile in the Lyft app, (11) reports of the Driver driving under the influence, and (12) a rider report about improper or unscheduled drop-off or stop before completion of the ride.

Note: Excluded from this Fact Sheet production requirement are tickets relating to speeding, minor traffic infractions, car accidents, other claims regarding unsafe driving (unless falling in one of the specifically identified categories of conduct, above), and any other complaints regarding the Driver.

22. Did You receive any message, report, or transmission from any law enforcement agency regarding the Subject Trip relating to the Incident? (Yes/No)
 - a. If yes, produce the Communications with law enforcement and Lyft's Subpoena Compliance Team regarding the Incident to the extent available, reasonably ascertainable, and not subject to any non-disclosure order.
23. What is the total number of trips the Driver has completed using the Lyft Driver App?
24. What is the Driver's average star rating on the Lyft Driver App?

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V. INCIDENT

25. Did Plaintiff or someone on Plaintiff's behalf report the Incident to Lyft (Yes/No)?

- a. If Your answer to the above question is "Yes," please produce all Communications, regarding the Incident, between Lyft and Plaintiff, Lyft and the Driver, or Lyft and any other witness to the Incident.

VI. CERTIFICATION

The foregoing answers were prepared with the assistance of a number of individuals, including counsel, upon whose advice and information I relied. I declare under penalty of perjury subject to 28 U.S.C. 1746 that all of the information provided in this Defendant Fact Sheet is complete, true, and correct to the best of my knowledge.

Signature

Print Name/Title

Date