

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: LYFT, INC. PASSENGER
SEXUAL ASSAULT LITIGATION

No. 3:26-md-03171-RFL (LJC)

MDL 3171

This Document Relates to:
ALL ACTIONS

~~[PROPOSED]~~ [STIPULATED] PRETRIAL
ORDER **[18]**: DISCOVERY DISPUTE
RESOLUTION PROCEDURES **AS
MODIFIED**

Pretrial Order No. 2 (Dkt. 77) referred this case to the undersigned magistrate judge for all discovery purposes. At the June 23, 2026 discovery hearing, the undersigned directed the parties to file a proposal for procedures governing discovery disputes in this proceeding (Dkt. 226). Having reviewed the parties' proposal (Dkt. [257]), and to streamline resolution of discovery disputes resolution, the Court sets forth the following:

1. A discovery dispute is defined as a refusal to fully produce requested discovery, an inability to agree on the parameters of discovery sought or ordered, or an inability to agree on the parameters of the parties' preservation obligations under PTO No. 13 (Dkt. 188).¹ Evidentiary motions pertaining to discovery (*e.g.*, motions for spoliation, motions *in limine*) will remain with the presiding judge.

¹ The procedures in PTO 13 governing applications for leave to depart from the preservation requirements remain in place and supersede the procedures set forth herein solely for those applications.

2. Upon identification of a discovery dispute, a party shall first request a meet and confer regarding the dispute. Unless both parties otherwise agree, the meet-and-confer process shall begin within three business days of a party making a request to confer.

3. Counsel for each party must confer in person or by videoconference. A mere exchange of letters, emails, or telephone calls does not satisfy the meet-and-confer requirement.

4. If the parties remain at an impasse after conferring, the party requesting relief (the moving party) may initiate the joint discovery letter process set forth in this paragraph. That party must, no earlier than three business days after the parties have finished conferring, proffer via email to the opposing party its single spaced three-page portion of a joint discovery letter setting forth its position on the dispute. The opposing party then shall have three business days to provide its written response of no more than three single spaced pages, to be included in the joint letter. The parties then shall have one business day to provide any additional changes to their respective portions of the letter, after which the joint submission shall be promptly filed. Absent other agreement, the parties shall exchange revised drafts with any additional changes (in redline or highlighted) to their respective portions of the letter by 3:00 p.m. Pacific Time on the day of filing, and the party seeking the relief, without making any further substantive changes, shall submit the filing by 5:00 p.m. Pacific Time that same day. The parties may agree to exchange interim drafts prior to finalizing their respective portions set forth above.

~~5. Subject to the one additional page per party contemplated in paragraph 8 below,~~
 The joint letter shall be in text-searchable PDF format and shall not exceed six single spaced pages (12-point font or greater including for footnotes, single-spaced, margins no less than one inch) without leave of the Court, with no party's section exceeding three single spaced pages. The contents of the letter need not include case-management deadlines or other particulars set forth in the undersigned's Standing Order, Paragraph F.5 regarding discovery disputes. Joint discovery letters must be filed in ECF under the Civil Events category of Motions and Related Filings > Motions: General > Discovery Letter Brief.

6. If the opposing party fails to participate in the requested meet and confer in good faith within the three business-day period specified in paragraph 2 above, the party seeking

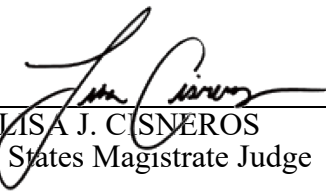
1 discovery may file an individual statement with the Court seeking the Court's assistance. A party
2 intending to file a statement under this paragraph 6 must provide email notice to all parties at least
3 24 hours prior to such filing. The individual statement shall be supported by a declaration from the
4 attorney who was responsible for attempting to meet and confer explaining the circumstances.

5 7. The parties may submit exhibits, not to exceed ten pages excluding the
6 joint discovery letter, with any joint discovery letter or individual statement.

7 8. Any discovery dispute presented in a manner contrary to the provisions in this Order
8 may be stricken from the record.

9
10 **IT IS SO ORDERED.**

11 Dated: July 13, 2026

12 
HON. LISA J. CISNEROS
United States Magistrate Judge