

**BEFORE THE UNITED STATES JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION**

*In re: Uber Passenger Sexual
Assault Litigation*)
) MDL Docket No. _____
)
)

**MOTION OF PLAINTIFFS FOR TRANSFER OF ACTIONS TO THE NORTHERN DISTRICT
OF CALIFORNIA PURSUANT TO 28 U.S.C. § 1407 FOR COORDINATED OR
CONSOLIDATED PRETRIAL PROCEEDINGS**

Plaintiffs A.G., Kathrine Hylin, Taylor Gavin, Cynthia Crawford, E.R., A.M., A.H.M., H.B., C.S., Jillian Sullivan, Elunda Murphy, N.R., S.W., and Aundreya Rollo (collectively “Movants”)¹ respectfully move the Judicial Panel on Multidistrict Litigation (“Panel”), pursuant to 28 U.S.C. § 1407 and Rule 6.2 of the Rules of Procedure of the Panel, to transfer the actions listed in the attached Schedule of Actions and all subsequent tag-along actions to the United States District Court for the Northern District of California, for coordinated or consolidated proceedings before the Honorable Judge Charles R. Breyer, who currently presides over Plaintiff A.G.’s action², or before the Honorable Judge Araceli Martínez-Olguín, who presides over the first-filed case in this litigation, *Katherine Hylin v. Uber Technologies, Inc., et al.*, No. 3:23-cv-01630 (N.D. CA), as well as two additional cases, *Taylor Gavin, v. Uber Technologies, Inc., et al.*, No. 3:23-cv-02111 (N.D. CA), and *Jane Doe LSA v. Uber Technologies, Inc., et al.*, No. 3:23-cv-01165 (N.D. CA).

¹ Movants are the named plaintiffs in fourteen of the first cases filed in this matter, which are presently pending in the United States District Courts for the Northern District of Illinois, Northern District of California, Southern District of Texas, Northern District of Georgia, and Eastern District of North Carolina. See Schedule of Actions.

² *A.G. v. Uber Technologies, Inc., et al.*, No. 3:23-cv-02071 (N.D. CA.).

Plaintiffs also contemporaneously submit their memorandum in support of this motion, incorporated herein by reference, setting forth the reasons why these cases should be transferred to the Northern District of California. For the reasons stated therein, Movants respectfully request that the Panel transfer the scheduled actions and any additional tag-along actions to the Northern District of California for coordinated or consolidated pretrial proceedings before the Honorable Charles R. Breyer or the Honorable Araceli Martínez-Olguín.

Dated: July 14, 2023

Respectfully submitted,

/s/ Rachel Abrams

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