Case 3:23-md-03084-CRB Document 3533 Filed 07/21/25 RASO & VAUGHN KIRKLAND & ELLIS LLP 1 Jessica Davidson (Admitted Pro Hac Vice) 2 jessica.davidson@kirkland.com 601 Lexington Avenue New York, NY 10022 3 Telephone: (212) 446-4800 Facsimile: (212) 446-4900 4 5 Allison M. Brown (*Admitted Pro Hac Vice*) alli.brown@kirkland.com 2005 Market Street, Suite 1000 6 Philadelphia, PA 19103 Telephone: (215) 268-5000 Facsimile: (215) 268-5001 7 8 Laura Vartain Horn (SBN 258485) laura.vartain@kirkland.com 9 555 California Street 10 San Francisco, CA 94104 Telephone: (415) 439-1400 Facsimile: (415) 439-1500 11 12 Attorneys for Defendants UBER TECHNOLOGIES, INC., RASIER, LLC 13 and RASIER-CA, LLC [Additional Counsel Listed on Following Pages] 14 UNITED STATES DISTRICT COURT 15 NORTHERN DISTRICT OF CALIFORNIA 16 SAN FRANCISCO DIVISION 17 Case No. 3:23-md-03084-CRB (LJC) IN RE UBER TECHNOLOGIES, INC. 18 PASSENGER SEXUAL ASSAULT LITIGATION STIPULATION AND [PROPOSED] ORDER 19 TO RESET DEADLINES RE PTO NO. 26 This Document Relates To: 20 WHB 823 v. Uber Technologies, Inc., et al., Hon. Charles R. Breyer Judge: Courtroom: Case No. 24-cv-4900; Courtroom 6 – 17th Floor 21 A.R.2 v. Uber Technologies, Inc., et al., 22 Case No. 24-cv-7821; 23 B.L. v. Uber Technologies, Inc., et al., Case No. 24-cv-7940; 24 Dean v. Uber Technologies, Inc., et al., Case No. 23-cv-6708; 25 LCHB128 v. Uber Technologies, Inc., et al., Case No. 24-cy-7019; and 26 27 28

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1	SHOOK HARDY & BACON LLP Alycia Degen (SBN 211350)
2	adegen@shb.com
3	Michael B. Shortnacy (SBN 277035) mshortnacy@shb.com
4	2121 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067
5	Telephone: (424) 285-8330 Facsimile: (424) 204-9093
6	Patrick L. Oot, Jr. (Admitted Pro Hac Vice)
7	oot@shb.com 1800 K St. NW Ste. 1000
8	Washington, DC 20006 Telephone: (202) 783-8400
9	Facsimile: (202) 783-4211
10	Christopher V. Cotton (Admitted Pro Hac Vice) ccotton@shb.com
11	Maria Salcedo (Admitted Pro Hac Vice)
12	msalcedo@shb.com 2555 Grand Blvd.
13	Kansas City, MO 64108 Telephone: (816) 474-6550
14	Facsimile: (816) 421-5547
15	O'MELVENY AND MYERS LLP Sabrina H. Strong (SBN 200292)
16	sstrong@omm.com Jonathan Schneller (SBN 291288)
17	jschneller@omm.com 400 South Hope Street, 19th Floor
18	Los Angeles, CA 90071 Telephone: (213) 430-6000
19	Facsimile: (213) 430-6407
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WHEREAS, on May 1, 2025, the Court issued Pretrial Order No. 26: Bellwether Trial Wave 1 Case Assignments and Discovery Schedule;

WHEREAS, Pretrial Order No. 26 required the parties to exchange expert reports by August 8, 2025 and rebuttal expert reports by September 8, 2025;

WHEREAS, on July 8, 2025, the Court issued Pretrial Order No. 28: Order on Defendants' Motion to Dismiss Plaintiffs' Bellwether Complaints. Pursuant to the Federal Rules of Civil Procedure, Defendants' Answers to the Bellwether Complaints are due July 22, 2025.

WHEREAS, the parties agree to set dates for Defendants' Answers, such that Defendants will answer all Wave 1 Plaintiffs' Short-Form Complaints and the Master Long-Form Complaint on August 5, 2025, and will answer the remaining Bellwether Complaints on August 19, 2025.

WHEREAS, the parties agree that fact discovery that remains to be completed requires extending the deadlines for expert discovery.

WHEREAS, the parties agree that the Expert Deadlines as set out at PTO 26 Paragraph be modified such that the exchange of expert reports will move from August 8 to August 22. The exchange of rebuttal expert reports will move from September 8 to 22.

WHEREAS, the parties agree that the close of discovery, as set out at PTO 26 Paragraph c will move from September 22, 2025 to October 6, 2025.

WHEREAS, the parties agree that extending the aforementioned deadlines will not require extending any other deadlines set by Pretrial Order No. 26.

THEREFORE, the parties respectfully request the Court enter the parties' stipulation that Defendants provide answers on the dates set out above, and that the following deadlines set by Pretrial Order No. 26 be extended as follows:

- The parties shall exchange expert reports by August 22, 2025.
- The parties shall exchange expert rebuttal reports by September 22, 2025.
- The close of discovery will be October 6, 2025.

IT IS SO STIPULATED.

1	DATED: July 17, 2025	KIRKLAND & ELLIS LLP
2		/s/ Laura Vartain Horn
3		Jessica Davidson (Admitted Pro Hac Vice) jessica.davidson@kirkland.com
4 5		601 Lexington Avenue New York, NY 10022 Telephone: (212) 446-4800
6		Facsimile: (212) 446-4900
7		Allison M. Brown (Admitted Pro Hac Vice)
8		alli.brown@kirkland.com 2005 Market Street, Suite 1000 Philadelphia, PA 19103
9		Telephone: (215) 268-5000 Facsimile: (215) 268-5001
10		Laura Vartain Horn (SBN 258485)
11		laura.vartain@kirkland.com 555 California Street
12		San Francisco, CA 94104 Telephone: (415) 439-1400
13		Facsimile: (415) 439-1500
14		Attorneys for Defendants UBER TECHNOLOGIES, INC.,
15		RASIER, LLC, and RASIER-CA, LLC
16	DATED: July 17, 2025	GIRARD SHARP LLP
17		/s/ Andrew R. Kaufman
18		ROOPAL P. LUHANA (Pro Hac Vice) CHAFFIN LUHANA LLP
19		600 Third Avenue, Fl. 12 New York, NY 10016
20		Telephone: (888) 480-1123 Email: luhana@chaffinluhana.com
21		SARAH R. LONDON (SBN 267083)
22		ANDREW R. KAUFMAN (<i>Pro Hac Vice</i>) GIRARD SHARP LLP
23		601 California St., Suite 1400 San Francisco, CA 94108
24		Telephone: (415) 981-4800 Email: slondon@girardsharp.com
25		Email: akaufman@girardsharp.com
26		RACHEL B. ABRAMS (SBN 209316) PEIFFER WOLF CARR KANE CONWAY &
27		WISE, LLP 555 Montgomery Street, Suite 820
28		San Francisco, CA 94111 Telephone: (415) 426-5641
		2

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1	Email: rabrams@peifferwolf.com					
2		Co-Lead Counsel for Plaintiffs				
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ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

/s/ Laura Vartain Horn Laura Vartain Horn DATED: July 17, 2025

PROPOSED ORDER

IT IS SO ORDERED.

Dated: ______ July 21, 2025

