

COURT EXHIBIT 1A

Designation Run Report for Chad Dobbs
as played in Court 01/14/2026 (08-21-2025)

DOBBS, CHAD - v06P_As-Played in Court 01/14/2026

Designation List Report



Dobbs, Chad

2025-08-21

Dobbs, Chad

2025-08-21

PLF Affirmative

00:31:30

DEF Counter

00:07:12

TOTAL RUN TIME

00:38:43



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DESIGNATION	SOURCE	DURATION	ID
6:15 - 6:17	Dobbs, Chad 2025-08-21 - PIP MP4 6:15 Q. Could you please state your full 6:16 name for the record? 6:17 A. Yes. My name is Chad Andrew Dobbs.	00:00:06	DC_v6P.1
9:21 - 10:08	Dobbs, Chad 2025-08-21 - PIP MP4 9:21 Q. Mr. Dobbs, you are (edited) 9:22 the head of US City Operations for Uber; is 9:23 that correct? 9:24 A. That's correct. 9:25 Q. And how long have you held that 10:01 C. Dobbs - Highly Confidential 10:02 position? 10:03 A. Probably about three years. 10:04 Q. Okay. So since sometime in 2022? 10:05 A. That's right. 10:06 Q. But you worked at Uber since 2013; 10:07 is that right? 10:08 A. Correct.	00:00:23	DC_v6P.2
50:20 - 50:23	Dobbs, Chad 2025-08-21 - PIP MP4 50:20 When you first started at the 50:21 company, it was still run by Travis Kalanick; 50:22 is that correct? 50:23 A. That's right.	00:00:07	DC_v6P.3
51:15 - 51:17	Dobbs, Chad 2025-08-21 - PIP MP4 51:15 Q. let's look at Exhibit -- (edited) 51:16 what's gonna be Exhibit 1894 to your 51:17 deposition, and this is AW133.	00:00:12	DC_v6P.4
52:03 - 52:07	Dobbs, Chad 2025-08-21 - PIP MP4 52:03 Q. And if we scroll down to the second 52:04 page of this document, you can see that this 52:05 is an email that was sent by Travis Kalanick 52:06 on February 12, 2016, correct? 52:07 A. I do see that.	00:00:20	DC_v6P.5
52:21 - 53:03	Dobbs, Chad 2025-08-21 - PIP MP4 52:21 Mr. Kalanick sent this email to the listserv 52:22 Uber Team, right? 52:23 A. He did. 52:24 Q. And who was included in that 52:25 listserv?	00:00:14	DC_v6P.6

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DESIGNATION	SOURCE	DURATION	ID
	53:01 C. Dobbs - Highly Confidential		
	53:02 A. Generally this would've been all		
	53:03 Uber employees.		
54:04 - 54:13	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:20	DC_v6P.7
	54:04 So what Mr. Kalanick says to -- in		
	54:05 this email to the full Uber team is:		
	54:06 Hey all.		
	54:07 As we've all been engaged in		
	54:08 bottoms-up planning for 2016, I've ended up		
	54:09 spending serious time prioritizing what's		
	54:10 going to matter most to Uber from a high		
	54:11 level.		
	54:12 Do you see that?		
	54:13 A. I do.		
55:21 - 56:13	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:33	DC_v6P.8
	55:21 Q. And Objective 1 is: Butts (edited)		
	55:22 in seats.		
	55:23 Do you see that?		
	55:24 A. Yes.		
	55:25 Q. Mr. Kalanick, the cofounder of Uber		
	56:01 C. Dobbs - Highly Confidential		
	56:02 and the CEO at the time, says:		
	56:03 At Uber, everything starts with		
	56:04 getting more people in Uber connected cars.		
	56:05 Do you see that?		
	56:06 A. I do.		
	56:07 Q. We do this by getting the word out		
	56:08 to new riders, partnering with companies in		
	56:09 cities around the world, opening new cities,		
	56:10 lowering prices and dozens of other		
	56:11 activities.		
	56:12 Do you see that?		
	56:13 A. I do.		
56:14 - 58:22	Dobbs, Chad 2025-08-21 - PIP MP4	00:02:28	DC_v6P.9
	56:14 Q. And Mr. Kalanick goes on to explain		
	56:15 how this concept of butts in seats is		
	56:16 critical to growth in Uber, right?		
	56:17 A. I don't know if he uses that exact		
	56:18 language, but he talks about the importance		
	56:19 of butts in seats.		

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DESIGNATION	SOURCE	DURATION	ID
56:20	Q. Okay. In fact, he says:		
56:21	That means drivers having more		
56:22	butts in their open seats for more minutes of		
56:23	the day.		
56:24	Right?		
56:25	A. He did say that.		
57:01	C. Dobbs - Highly Confidential		
57:02	Q. And what we mean by that is not		
57:03	just having more drivers driving for Uber,		
57:04	but having those drivers drive more, right?		
57:05	A. No. That's not what this means.		
57:06	Q. Okay. Tell me what Uber says this		
57:07	means.		
57:08	A. So that -- the sentence says that		
57:09	means the drivers having more butts in their		
57:10	open seats for more minutes of the day.		
57:11	Q. Okay.		
57:12	A. That's saying, you know, if I have		
57:13	a Toyota Camry, there are more open seats		
57:14	other than me driving in the front of the		
57:15	car. This is saying having more of those		
57:16	seats occupied with people.		
57:17	Q. I see. Okay. Good. That's a very		
57:18	helpful qualification.		
57:19	The idea though is drivers		
57:20	providing more rides to more people		
57:21	throughout the day, right?		
57:22	A. Yeah. I don't think that's quite		
57:23	the right interpretation.		
57:24	Q. What does Uber say is the right		
57:25	interpretation?		
58:01	C. Dobbs - Highly Confidential		
58:02	A. I think it's what we just spoke		
58:03	about, that this is about having more people		
58:04	in the available seats in the various		
58:05	vehicles that are operating on the Uber		
58:06	platform. It's about efficiency of the open		
58:07	seats that are available in these cars.		
58:08	Q. Uber wants to fill those seats,		
58:09	right?		
58:10	A. That's what this objective is		

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DESIGNATION	SOURCE	DURATION	ID
	58:11 about.		
	58:12 Q. Okay. And to achieve that		
	58:13 objective, Mr. Kalanick talks about		
	58:14 initiatives on price cuts, Uber Pool, dynamic		
	58:15 pricing and supply positioning.		
	58:16 Do you see that?		
	58:17 A. I do.		
	58:18 Q. And he says that:		
	58:19 Those things will help to utilize		
	58:20 every available seat in our ecosystem.		
	58:21 Right?		
	58:22 A. He does.		
58:23 - 58:24	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:08	DC_v6P.10
	58:23 Q. He goes on. Let's skip down (edited)		
	58:24 to Objective 3 now. (edited)		
59:06 - 59:16	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:17	DC_v6P.11
	59:06 Q. And Objective 3 is the Uber Labor		
	59:07 Department.		
	59:08 Do you see that?		
	59:09 A. I do.		
	59:10 Q. He says:		
	59:11 In 2016, we will build the Uber		
	59:12 Labor Department - among the biggest job		
	59:13 creation opportunities the world has ever		
	59:14 seen.		
	59:15 Do you see that?		
	59:16 A. I do.		
59:23 - 60:02	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:08	DC_v6P.12
	59:23 This means close to 2 million		
	59:24 first-time drivers in the US alone.		
	59:25 Right?		
	60:01 C. Dobbs - Highly Confidential		
	60:02 A. That's what it says.		
61:06 - 61:17	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:25	DC_v6P.13
	61:06 Q. Let's skip down to (edited)		
	61:07 Objective 5. Do you see in Objective 5,		
	61:08 Mr. Kalanick talks about Math for Marketing.		
	61:09 Do you see that?		
	61:10 A. I do.		

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DESIGNATION	SOURCE	DURATION	ID
	61:11 Q. And he says:		
	61:12 Did you know that Uber will be		
	61:13 spending over \$3 billion in market		
	61:14 (advertising, promotions, incentives and		
	61:15 referring) this year?		
	61:16 Do you see that?		
	61:17 A. I do.		
61:20 - 62:17	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:57	DC_v6P.14
	61:20 This advertising, the promotions,		
	61:21 the incentives and the referrals, one of the		
	61:22 things Uber was doing through those marketing		
	61:23 efforts was working to get more people		
	61:24 driving for Uber Rides, correct?		
	61:25 A. Like any business that's involved		
	62:01 C. Dobbs - Highly Confidential		
	62:02 in advertising or promotions or incentives,		
	62:03 we were using these things as marketing tools		
	62:04 to connect with potential and existing		
	62:05 customers, both riders and drivers.		
	62:06 Q. And he goes on to say:		
	62:07 Yeah, that's a really big number.		
	62:08 Do you see that?		
	62:09 A. I do.		
	62:10 Q. And Uber agrees that \$3 billion in		
	62:11 marketing, that is a really big number,		
	62:12 right?		
	62:13 A. I think it all depends on kinda who		
	62:14 you ask or what you're comparing it to, but		
	62:15 \$3 billion is generally a lot of money.		
	62:16 Q. Uber can agree that \$3 billion is a		
	62:17 lot of money, right?		
62:20 - 63:03	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:18	DC_v6P.15
	62:20 A. Again, I think it depends on the		
	62:21 time and who you're asking and what you're		
	62:22 comparing it against.		
	62:23 Q. In some regards, \$3 billion isn't		
	62:24 that much money to Uber?		
	62:25 A. I think generally it would be seen		
	63:01 C. Dobbs - Highly Confidential		
	63:02 as a decent amount of money, but I think it's		

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DESIGNATION	SOURCE	DURATION	ID
	63:03 all a matter of comparison.		
63:08 - 64:05	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:39	DC_v6P.16
	63:08 Q. And what he says is:		
	63:09 It means we need to make sure we're		
	63:10 getting the most for our money.		
	63:11 Right?		
	63:12 A. Yes.		
	63:13 Q. He says:		
	63:14 In 2016, we will up our math game		
	63:15 to drive optimal growth.		
	63:16 Right?		
	63:17 A. Yes.		
	63:18 Q. And one of the things that he's		
	63:19 saying Uber's gonna to do make that happen is		
	63:20 to use algorithms.		
	63:21 Do you see that?		
	63:22 A. He does reference algorithms.		
	63:23 Q. And he says:		
	63:24 This means powerful marketing tools		
	63:25 so our people function like fighter pilots		
	64:01 C. Dobbs - Highly Confidential		
	64:02 when they're in the cities helping to grow		
	64:03 Uber.		
	64:04 Do you see that?		
	64:05 A. I do.		
65:04 - 65:11	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:18	DC_v6P.17
	65:04 This means bringing more machine		
	65:05 intelligence to our performance marketing		
	65:06 spend, using sophisticated algorithms to		
	65:07 deploy incentives and promotions, and getting		
	65:08 far smarter about the rider/driver balance		
	65:09 that will maximize city growth.		
	65:10 Do you see that?		
	65:11 A. I do.		
66:05 - 66:06	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:05	DC_v6P.18
	66:05 Q. At Uber, growth comes above (edited)		
	66:06 everything else, fair?		
66:08 - 66:13	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:12	DC_v6P.19
	66:08 A. I don't think that's a fair		

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DESIGNATION	SOURCE	DURATION	ID
	66:09 statement.		
	66:10 Q. Okay.		
	66:11 MS. WALSH: Well, let's look at		
	66:12 AW218, which we're gonna mark as		
	66:13 Exhibit 1895 to your deposition. (edited)		
69:18 - 70:14	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:41	DC_v6P.20
	69:18 you see here what (edited)		
	69:19 Uber says in this internal document is:		
	69:20 For years, growth, a greater than		
	69:21 sign, everything else.		
	69:22 Do you see that?		
	69:23 A. I do.		
	69:24 Q. So it says:		
	69:25 Growth -- for years, growth is		
	70:01 C. Dobbs - Highly Confidential		
	70:02 greater than everything else for Uber.		
	70:03 Do you see that?		
	70:04 A. I see that.		
	70:05 Q. It says:		
	70:06 Rider demand was rampant.		
	70:07 Capital was cheap.		
	70:08 Supply was our constraint.		
	70:09 Do you see that?		
	70:10 A. I do.		
	70:11 Q. And supply, we're talking about		
	70:12 drivers providing rides, right?		
	70:13 A. Supply refers to drivers and the		
	70:14 hours they're spending on the platform.		
70:17 - 71:18	Dobbs, Chad 2025-08-21 - PIP MP4	00:01:06	DC_v6P.21
	70:17 Uber wants to increase its supply		
	70:18 so he can meet -- strike that.		
	70:19 Uber wants to increase the supply		
	70:20 of drivers so that Uber can meet this rampant		
	70:21 rider demand, right?		
	70:22 A. Generally, as I've talked about, we		
	70:23 want to provide balance in the marketplace so		
	70:24 that using Uber is a good experience for both		
	70:25 riders and drivers. What we, you know, saw,		
	71:01 C. Dobbs - Highly Confidential		
	71:02 you know, throughout Uber's history and		

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DESIGNATION	SOURCE	DURATION	ID
	71:03 certainly for our early history, is this		
	71:04 suggests rider demand grew really, really		
	71:05 fast.		
	71:06 Riders used Uber, they had really		
	71:07 good experiences, they told their friends,		
	71:08 they used it more, their friends used it,		
	71:09 they told their friends. Demand grew a lot.		
	71:10 And in order to keep up with that demand, one		
	71:11 of our priorities was to grow supply to again		
	71:12 bring balance to the marketplace.		
	71:13 Q. In order to meet that demand, Uber		
	71:14 wanted to acquire more drivers, right?		
	71:15 A. Getting new drivers to use the		
	71:16 platform, to try the platform was part of,		
	71:17 you know, what I suggested, bringing balance		
	71:18 to the marketplace.		
72:06 - 72:09	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:06	DC_v6P.22
	72:06 We met demand through aggressive		
	72:07 spending on driver acquisition.		
	72:08 Do you see that?		
	72:09 A. I do.		
72:12 - 72:15	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:06	DC_v6P.23
	72:12 And existing driver incentives to		
	72:13 maximize hours.		
	72:14 Do you see that?		
	72:15 A. I do.		
74:22 - 76:20	Dobbs, Chad 2025-08-21 - PIP MP4	00:02:11	DC_v6P.24
	74:22 Q. You also thought this was a moment		
	74:23 in time where you should figure out who all		
	74:24 these -- who all these folks are who are		
	74:25 driving for Uber, right?		
	75:01 C. Dobbs - Highly Confidential		
	75:02 A. I don't know what you mean by that.		
	75:03 Q. Well, let's flip to PDF 38, please.		
	75:04 We can see that at this time in		
	75:05 2017 Uber had over 3 million active drivers,		
	75:06 right?		
	75:07 A. Yes, that looks right.		
	75:08 Q. And 91 million signed-up prospects		
	75:09 across the globe, right?		

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DESIGNATION	SOURCE	DURATION	ID
75:10	A. I see that.		
75:11	Q. And if you look at the graph on the		
75:12	side, it's Monthly Active Drivers Globally.		
75:13	Do you see that?		
75:14	A. I do.		
75:15	Q. And you see how those numbers are		
75:16	just -- you're achieving that growth in these		
75:17	active drivers globally, right?		
75:18	A. They're -- most months it looks		
75:19	like there was growth in the number of active		
75:20	drivers.		
75:21	Q. Yeah. That -- that line is going		
75:22	up, correct?		
75:23	A. Most months it looks like the line		
75:24	goes up.		
75:25	Q. Okay. But the question that was		
76:01	C. Dobbs - Highly Confidential		
76:02	being asked in this deck, if we look at the		
76:03	next slide, if we look at -- there are notes		
76:04	to this deck, right?		
76:05	MS. WALSH: If we can zoom out,		
76:06	please, Diane.		
76:07	Q. You see where it says:		
76:08	A key question is who are these		
76:09	folks?		
76:10	A. I do see that.		
76:11	Q. Okay. So that was the question		
76:12	that was being asked in this slide, right?		
76:13	A. I don't know that that was the		
76:14	question necessarily being asked in this		
76:15	slide. This is a -- like speaker notes on		
76:16	slide number, I don't know, 50 on -- or		
76:17	something on this slide deck. You know, that		
76:18	may have been a consideration when talking		
76:19	about this slide, but I don't know that it		
76:20	was the main talking point.		
76:21 - 77:06	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:24	DC_v6P.25
76:21	Q. It was a consideration to (edited)		
76:22	try to figure out who are these folks driving		
76:23	for Uber, right?		

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DESIGNATION	SOURCE	DURATION	ID
	76:24 A. I think generally what this is		
	76:25 saying is if we want to improve driver		
	77:01 C. Dobbs - Highly Confidential		
	77:02 satisfaction on the platform, we should		
	77:03 probably have a better idea of, you know, who		
	77:04 drivers are and what they're looking for and		
	77:05 so we can kind of, you know, address the		
	77:06 needs and feedback they have.		
77:10 - 78:12	Dobbs, Chad 2025-08-21 - PIP MP4	00:01:07	DC_v6P.26
	77:10 It was also important to understand		
	77:11 who these people are because that can affect		
	77:12 the experience riders are having on the		
	77:13 platform, right?		
	77:14 A. I don't -- I don't think those two		
	77:15 things are quite connected the way you're		
	77:16 suggesting. I think this is -- you know,		
	77:17 this is talking about who the folks are in		
	77:18 terms of, like, what they care about, what		
	77:19 they -- like, what they want from the Uber		
	77:20 platform.		
	77:21 You know, I think any business,		
	77:22 when I think about their customers, they want		
	77:23 to know why are our customers using our		
	77:24 particular product or service. And so this		
	77:25 is suggesting we should kind of understand		
	78:01 C. Dobbs - Highly Confidential		
	78:02 drivers more from that perspective.		
	78:03 I think it sounded like where you		
	78:04 were going is, like, kinda like more deeply		
	78:05 understanding demographics or background		
	78:06 information in a way to determine, you know,		
	78:07 if they're going to be better or worse		
	78:08 drivers on the platform. Certainly we do		
	78:09 want to have good drivers on the platform,		
	78:10 but I don't know that this specific question		
	78:11 on this slide was written to think about that		
	78:12 angle of kind of who drivers are.		
80:02 - 80:13	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:32	DC_v6P.27
	80:02 Q. And Uber knew at this time that		
	80:03 riders were already reporting that they were		

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	80:04 having negative experiences on their Uber		
	80:05 Rides, right?		
	80:06 A. Uber was aware of negative		
	80:07 experiences.		
	80:08 Q. Okay. Let's flip down to PDF 83,		
	80:09 please, the portion of this deck that		
	80:10 addresses rider experience.		
	80:11 Do you see that?		
	80:12 A. Give me a minute to get down to		
	80:13 Slide 83. (edited)		
80:14 - 81:04	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:36	DC_v6P.28
	80:14 Q. And what you see on the next (edited)		
	80:15 slide is a testimonial from a rider saying:		
	80:16 In the past 2.5 years, I have seen		
	80:17 the driver quality totally deteriorate.		
	80:18 Do you see that?		
	80:19 A. I have.		
	80:20 Q. I believe there should be an actual		
	80:21 driving test for some of these drivers since		
	80:22 they don't seem to have any common sense.		
	80:23 Do you see that?		
	80:24 A. I do.		
	80:25 Q. In some cases, it's embarrassing		
	81:01 C. Dobbs - Highly Confidential		
	81:02 for me to be associated with Uber.		
	81:03 Do you see that?		
	81:04 A. I do.		
83:06 - 83:08	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:06	DC_v6P.29
	83:06 MS. WALSH: Let's take a look at		
	83:07 what is going to be Exhibit 1896 to		
	83:08 your deposition. (edited)		
84:03 - 84:11	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:15	DC_v6P.30
	84:03 Q. And this presentation is from		
	84:04 November 2018.		
	84:05 Do you see that?		
	84:06 A. I do.		
	84:07 Q. In reference to US S&P, what does		
	84:08 that mean?		
	84:09 A. That's a team on the US and Canada		
	84:10 operations team that's called strategy and		

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DESIGNATION	SOURCE	DURATION	ID
	84:11 planning.		
99:05 - 99:09	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:11	DC_v6P.31
	99:05 Q. What the next slide says is:		
	99:06 In general, we've not been able to		
	99:07 grow supply to keep up with demand.		
	99:08 Correct?		
	99:09 A. That's right.		
100:04 - 101:18	Dobbs, Chad 2025-08-21 - PIP MP4	00:01:44	DC_v6P.32
	100:04 Q. And so one way that Uber (edited)		
	100:05 tries to make sure that supply, drivers, are		
	100:06 keeping up with demand, riders, is by signing		
	100:07 up new drivers, right?		
	100:08 A. That is part of growing supply.		
	100:09 Q. Is by trying to encourage existing		
	100:10 drivers to provide more rides, right?		
	100:11 A. That's also a part of growing		
	100:12 supply.		
	100:13 Q. And another thing Uber wants to do		
	100:14 is try and prevent something called churn,		
	100:15 right?		
	100:16 A. That's also a part of growing		
	100:17 supply. And I think connecting us back to I		
	100:18 think the document we looked at just before		
	100:19 this where we're talking about driver		
	100:20 satisfaction, you know, we want drivers to		
	100:21 have a good experience on the platform so		
	100:22 that, you know, we can attract more drivers		
	100:23 to use the platform and so the drivers who		
	100:24 have tried the platform continue to use it.		
	100:25 So those things are very -- very much tied		
	101:01 C. Dobbs - Highly Confidential		
	101:02 together.		
	101:03 Q. And for the benefit of the jury,		
	101:04 this concept of churn, C-H-U-R-N, what does		
	101:05 that mean? What is churn and why is it bad?		
	101:06 A. Yeah. Churn refers to, for either		
	101:07 riders or drivers, you know, existing		
	101:08 customers stopping using your product or		
	101:09 service.		
	101:10 So it's a, you know, business		

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	101:11 concept that exists across any businesses.		
	101:12 But if, you know, I stopped going to		
	101:13 McDonald's for five years, they'd say you're		
	101:14 a churned customer of McDonald's. And if a		
	101:15 driver stops driving for a period of time on		
	101:16 Uber, we might say that driver has churned.		
	101:17 Same thing with a rider who has stopped using		
	101:18 the platform.		
101:19 - 102:03	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:27	DC_v6P.33
	101:19 Q. And you all want to try to (edited)		
	101:20 prevent churn, correct?		
	101:21 A. I think generally, yes. But there		
	101:22 are some users, riders and drivers that we		
	101:23 might be less inclined to be concerned about.		
	101:24 Ultimately, we want to grow kind of the good		
	101:25 drivers and good riders who are on the		
	102:01 C. Dobbs - Highly Confidential		
	102:02 platform and generally reduce churn. But I		
	102:03 don't think that's the case in all instances.		
103:08 - 103:24	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:42	DC_v6P.34
	103:08 Q. Churn makes growth more (edited)		
	103:09 challenging. Churn is also expensive for		
	103:10 Uber's business, right?		
	103:11 A. Churn -- you know, as a result of		
	103:12 churn, you have to -- to make up for the		
	103:13 number of drivers you're losing and so you,		
	103:14 you know, probably need to attract more new		
	103:15 drivers. As we've seen in previous		
	103:16 documents, you know, that requires marketing		
	103:17 and incentives and ultimately dollars to do		
	103:18 so.		
	103:19 Q. Right. And getting a driver on to		
	103:20 the platform costs Uber money, right?		
	103:21 A. Yep. They're -- oftentimes there's		
	103:22 money associated with that given the things I		
	103:23 just mentioned, like marketing and		
	103:24 incentives.		
104:09 - 104:11	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:04	DC_v6P.35
	104:09 MS. WALSH: Well, let's look at		
	104:10 AW134, which is gonna be Exhibit 1897		

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DESIGNATION	SOURCE	DURATION	ID
	104:11 to your deposition. (edited)		
104:17 - 105:22	Dobbs, Chad 2025-08-21 - PIP MP4	00:01:11	DC_v6P.36
	104:17 A. Okay. I have it open.		
	104:18 Q. Okay. And this is a PowerPoint		
	104:19 from July 17, 2018, right?		
	104:20 A. That's right.		
	104:21 Q. And it's about Driver Loyalty		
	104:22 Insights & Strategy, right?		
	104:23 A. It is.		
	104:24 Q. And just focusing on this concept		
	104:25 of churn, if we could turn to PDF 9, please.		
	105:01 C. Dobbs - Highly Confidential		
	105:02 What this is explaining is that		
	105:03 there's a problem. You see Problem at the		
	105:04 top?		
	105:05 A. I do.		
	105:06 Q. And it says:		
	105:07 For Uber: Driver churn, insurance,		
	105:08 support costs, and incentives, are expensive		
	105:09 to the business.		
	105:10 Do you see that?		
	105:11 A. I do.		
	105:12 Q. Okay. And if we -- and you agree		
	105:13 with that, right? Driver churn, that's		
	105:14 expensive to Uber's business, correct?		
	105:15 A. There are costs associated with		
	105:16 each of these things listed on the page.		
	105:17 Q. Okay. If we look below Key		
	105:18 Insights, do you see where it says:		
	105:19 [US only] At \$368 acquisition cost		
	105:20 per driver.		
	105:21 Do you see that?		
	105:22 A. I do.		
106:06 - 106:11	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:07	DC_v6P.37
	106:06 Q. It says:		
	106:07 Only 6 in every 20 new drivers will		
	106:08 be active at the end of their first year of		
	106:09 driving.		
	106:10 Right?		
	106:11 A. Yep.		

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DESIGNATION	SOURCE	DURATION	ID
107:23 - 108:11	Dobbs, Chad 2025-08-21 - PIP MP4 107:23 Q. Well, the insight that's (edited) 107:24 being discussed here is that of the ones who 107:25 stick around, only 1 of 20 retained is a high 108:01 C. Dobbs - Highly Confidential 108:02 quality driver. 108:03 Do you see that? 108:04 A. I do. I think what we don't know 108:05 is exactly how the author was defining "high 108:06 quality driver" in this instance. 108:07 Q. Okay. Well, regardless of how 108:08 "high quality" is defined, 1 out of 20, 108:09 that's a pretty low percentage. 108:10 Would you agree? 108:11 A. It's 5 percent.	00:00:31	DC_v6P.38
127:06 - 127:14	Dobbs, Chad 2025-08-21 - PIP MP4 127:06 Q. And you're familiar with (edited) 127:07 this concept of lifetime value? 127:08 A. Yes, I am. 127:09 Q. Okay. And what it says is: 127:10 What is an LTV? 127:11 LTV, or lifetime value, refers to 127:12 how much a driver or a rider is worth to us. 127:13 Do you see that? 127:14 A. I do.	00:00:22	DC_v6P.39
128:07 - 128:12	Dobbs, Chad 2025-08-21 - PIP MP4 128:07 Q. So Uber is looking at -- wants to 128:08 see how much drivers are worth versus how 128:09 much riders are worth to help decide how it 128:10 should be spending its money, right? 128:11 A. Yeah. This is one way for us to, 128:12 you know, help make business decisions.	00:00:21	DC_v6P.40
131:12 - 132:05	Dobbs, Chad 2025-08-21 - PIP MP4 131:12 Q. But on average, when a rider 131:13 decides to stop using Uber, that costs you 131:14 all less money than if a driver decides to 131:15 stop using Uber, right? 131:16 A. I think it, you know, depends on 131:17 the circumstance and, as we talked about 131:18 extensively on one of the previous slides,	00:00:45	DC_v6P.41

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DESIGNATION	SOURCE	DURATION	ID
	131:19 this is -- it's not a -- it's not a cost to		
	131:20 Uber in terms of we're not writing a check		
	131:21 because someone stopped using the platform.		
	131:22 Like, yes, we would love riders and		
	131:23 drivers to continue to use the platform		
	131:24 because, as a business, unsurprisingly, our		
	131:25 business is to grow the use of our platform.		
	132:01 C. Dobbs - Highly Confidential		
	132:02 And so we do what we can to make the platform		
	132:03 better for both riders and drivers to		
	132:04 encourage new users and existing users to		
	132:05 continue to use that.		
133:22 - 134:03	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:25	DC_v6P.42
	133:22 Q. Okay. So at this time, in this		
	133:23 City Ops PowerPoint, the information that was		
	133:24 included was that the average lifetime value		
	133:25 of a driver was about 25 times that of what		
	134:01 C. Dobbs - Highly Confidential		
	134:02 it was for a rider, right?		
	134:03 A. That's right.		
135:18 - 135:22	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:18	DC_v6P.43
	135:18 Q. Well, Uber would agree, right, that		
	135:19 it's the drivers though that are the oxygen		
	135:20 that power Uber services, right?		
	135:21 A. I don't know that that's, you know,		
	135:22 a commonly held way that we would put it.		
139:13 - 139:19	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:17	DC_v6P.44
	139:13 Q. And what's said in this -- (edited)		
	139:14 in this slide that was produced from the		
	139:15 CEO's files is that:		
	139:16 Monthly active drivers provide		
	139:17 oxygen that powers Uber's services.		
	139:18 Do you see that?		
	139:19 A. It does say that, yes.		
166:14 - 166:25	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:22	DC_v6P.45
	166:14 I was asking about the early days of (edited)		
	166:15 Uber and what Mr. Madeira [sic] says is:		
	166:16 In the early days of Uber, supply,		
	166:17 that is getting enough drivers on the road		

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DESIGNATION	SOURCE	DURATION	ID
	166:18 and during the right times and places, was		
	166:19 always the bottleneck to growth.		
	166:20 Do you see that?		
	166:21 A. I do.		
	166:22 Q. And he goes on to say:		
	166:23 And that has largely remained true.		
	166:24 Right?		
	166:25 A. He says that.		
167:02 - 167:23	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:56	DC_v6P.46
	167:02 Q. Okay. So whatever Uber's		
	167:03 testifying to today in this litigation, in		
	167:04 this internal email what Uber was saying and		
	167:05 recognizing is that in the early days, supply		
	167:06 was always the bottleneck to growth, and as		
	167:07 of the date of this email, 2022, that has		
	167:08 largely remained true.		
	167:09 Do you see that?		
	167:10 A. I see that. What I'm clarifying is		
	167:11 that this is an email written by one		
	167:12 individual who is kind of calling to action a		
	167:13 large group of people to say we really need		
	167:14 to focus on supply at this moment in time.		
	167:15 There are some levels of nuance and details		
	167:16 that aren't included in this communication		
	167:17 that, you know, are certainly true; that,		
	167:18 yes, supply has been a bottleneck to growth.		
	167:19 I'm not disputing that. I don't		
	167:20 think anyone at Uber would dispute that. But		
	167:21 saying that it's always a bottleneck to		
	167:22 growth I think is a bit of hyperbole.		
	167:23 Q. Okay.		
168:07 - 168:16	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:27	DC_v6P.47
	168:07 What he says down at the bottom is:		
	168:08 We've got to do the work and		
	168:09 pull -- the bottom of this paragraph. What		
	168:10 he says down at the bottom of this paragraph:		
	168:11 We've got to do the work and pull		
	168:12 every level available to us. Growth,		
	168:13 profitability, and CP, or category position,		
	168:14 are all on the line.		

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DESIGNATION	SOURCE	DURATION	ID
	168:15 Do you see that?		
	168:16 A. I do.		
168:20 - 169:07	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:27	DC_v6P.48
	168:20 - at the bottom we (edited)		
	168:21 see Mr. Jain forwards it to a number of		
	168:22 people, including yourself, right?		
	168:23 A. Right.		
	168:24 Q. And he agrees. He says:		
	168:25 +1 on being emphatic that US driver		
	169:01 C. Dobbs - Highly Confidential		
	169:02 growth is the highest priority.		
	169:03 Right?		
	169:04 A. That's what he wrote.		
	169:05 Q. And we know that you were copied on		
	169:06 this, right?		
	169:07 A. I was.		
203:13 - 203:18	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:18	DC_v6P.49
	203:13 Q. And Project Boomerang was a very		
	203:14 important initiative to address issues and		
	203:15 driver supply that Uber was experiencing in		
	203:16 the wake of the COVID pandemic, right?		
	203:17 A. Project Boomerang was an important		
	203:18 project.		
245:10 - 245:12	Dobbs, Chad 2025-08-21	00:00:10	DC_v6P.50
	245:10 Q. Mr. Dobbs, Project Boomerang ended		
	245:11 up being a successful initiative for Uber,		
	245:12 correct?		
245:15 - 245:19	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:16	DC_v6P.51
	245:15 A. I think that depends on who you		
	245:16 ask. There were some successes. There were		
	245:17 some failures. Yeah. I don't know if there		
	245:18 was an overall, you know, stamp of success or		
	245:19 approval on the initiative.		
246:02 - 246:03	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:04	DC_v6P.52
	246:02 Q. Okay. Well, let's see what		
	246:03 Mr. Khosrowshahi had to say about this.		
249:11 - 249:19	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:18	DC_v6P.53
	249:11 Q. And what he says is:		
	249:12 Team Boomerang. Nelson and I just		

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	249:13 got off our earnings call.		
	249:14 Do you see that?		
	249:15 A. Yes.		
	249:16 Q. And Nelson is a reference to the		
	249:17 chief financial officer of Uber at this time,		
	249:18 right?		
	249:19 A. That's right.		
250:08 - 250:15	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:20	DC_v6P.54
	250:08 Q. And who participates in an earnings		
	250:09 call, to your understanding? Who's listening		
	250:10 when Mr. Khosrowshahi and Mr. Chai are		
	250:11 talking?		
	250:12 A. The primary audience is, you know,		
	250:13 big investors or financial institutions. I'm		
	250:14 fairly confident that anyone can listen in if		
	250:15 they wanted.		
250:20 - 251:09	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:25	DC_v6P.55
	250:20 Your area is the area that		
	250:21 investors care about passionately.		
	250:22 Do you see that?		
	250:23 A. I do.		
	250:24 Q. My guess is about 50 percent of the		
	250:25 questions were about supply.		
	251:01 C. Dobbs - Highly Confidential		
	251:02 Do you see that?		
	251:03 A. I do.		
	251:04 Q. He says:		
	251:05 The good news is our driver		
	251:06 acquisition numbers look much, much better		
	251:07 than the numbers Lyft shared.		
	251:08 Right?		
	251:09 A. I do see that.		
251:19 - 251:23	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:13	DC_v6P.56
	251:19 Q. Okay. And he says below:		
	251:20 We've come a long way, but the		
	251:21 stakes are higher than they have ever been.		
	251:22 Do you see that?		
	251:23 A. I do.		
281:14 - 281:16	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:14	DC_v6P.57

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DESIGNATION	SOURCE	DURATION	ID
	281:14 Q. Well, Uber uses its rating -- its 281:15 star rating system as one way to create the 281:16 perception that Uber is safe, right?		DC_v6P.57
281:18 - 281:22	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:11	DC_v6P.58
	281:18 A. No. I don't think that's right. 281:19 Q. Okay. 281:20 MS. WALSH: Let's take a look at 281:21 what's gonna be Exhibit 1912 to your 281:22 deposition, which is AW21.		
282:14 - 282:17	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:09	DC_v6P.59
	282:14 Q. This was a document that was 282:15 created in January 2017. 282:16 Do you see that? 282:17 A. I do.		
283:15 - 283:19	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:09	DC_v6P.60
	283:15 Q. And what it says here: (edited) 283:16 At the end of every trip both 283:17 drivers and riders rate their experience. 283:18 Right? 283:19 A. That's right.		
284:08 - 284:14	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:16	DC_v6P.61
	284:08 Q. And what it says in the next (edited) 284:09 column is: 284:10 Ratings pull the vast majority of 284:11 weight today in ensuring safety perceptions 284:12 among riders - hugely valuable. 284:13 Do you see that? 284:14 A. I do.		
286:03 - 286:07	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:16	DC_v6P.62
	286:03 Q. And what we have here is a (edited) 286:04 presentation entitled Uber 2018 H2 Brand 286:05 Trust Campaign Safety Module. 286:06 Do you see that? 286:07 A. I do.		
286:17 - 287:24	Dobbs, Chad 2025-08-21 - PIP MP4	00:01:23	DC_v6P.63
	286:17 The objective of this safety 286:18 creative brief is to reinstall trust in Uber 286:19 by proving Uber is committed to safety? 286:20 Do you see that?		

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DESIGNATION	SOURCE	DURATION	ID
	286:21 A. I do.		
	286:22 Q. And underneath it talks about --		
	286:23 has a section called Opportunity, and what it		
	286:24 says is:		
	286:25 Gen pop has a negative perception		
	287:01 C. Dobbs - Highly Confidential		
	287:02 of Uber being safe due to incidents that have		
	287:03 occurred with drivers in the past.		
	287:04 Do you see that?		
	287:05 A. I do see that.		
	287:06 Q. And "gen pop" refers to the general		
	287:07 population, right?		
	287:08 A. It does.		
	287:09 Q. And then it says:		
	287:10 Opportunity.		
	287:11 Have riders and gen pop perceive		
	287:12 Uber as a safe service by highlighting the		
	287:13 experienced and professional drivers?		
	287:14 Do you see that?		
	287:15 A. I do.		
	287:16 Q. And under Proof Points, it says:		
	287:17 Vetting and driver profile (name,		
	287:18 picture, experience ratings, experience,		
	287:19 license plate, car).		
	287:20 Do you see that?		
	287:21 A. I do.		
	287:22 Q. So the idea here is ratings are one		
	287:23 thing that can be pointed to as indicating		
	287:24 the safety of an Uber ride, right?		
288:01 - 288:06	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:16	DC_v6P.64
	288:01 C. Dobbs - Highly Confidential		
	288:02 A. I think this is saying all these		
	288:03 factors, picture, experience, ratings,		
	288:04 license plate, car, all of those are useful		
	288:05 pieces of information for a rider or a		
	288:06 prospective rider.		
290:05 - 290:17	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:38	DC_v6P.65
	290:05 Q. Well, let's flip forward to (edited)		
	290:06 PDF 19. Okay? And what it says here is:		
	290:07 Let's make this and the other		

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	290:08 amazing things that live in the driver		
	290:09 profile the new cultural symbols of quality		
	290:10 and safety.		
	290:11 Do you see that?		
	290:12 A. I do.		
	290:13 Q. And you understand "this" to be		
	290:14 referring to the rating of the driver and the		
	290:15 amount of time the driver has been driving?		
	290:16 A. Amongst some of the other things we		
	290:17 spoke about earlier.		
302:23 - 305:17	Dobbs, Chad 2025-08-21 - PIP MP4	00:02:46	DC_v6P.66
	302:23 Q. Okay. The next slide says:		
	302:24 Framework for Making Safety-Related		
	302:25 Decisions.		
	303:01 C. Dobbs - Highly Confidential		
	303:02 Do you see that?		
	303:03 A. I do.		
	303:04 Q. And it says:		
	303:05 When making safety related		
	303:06 decisions, we compare annualized insurance		
	303:07 savings to expected supply replacement costs		
	303:08 across a variety of driver cohorts based on		
	303:09 their risk level.		
	303:10 Do you see that?		
	303:11 A. I do.		
	303:12 Q. And it says:		
	303:13 We make decisions that are then a		
	303:14 net benefit to Uber, right?		
	303:15 A. It does.		
	303:16 Q. And if you look below in green, it		
	303:17 says:		
	303:18 Annualized Insurance Savings.		
	303:19 Right?		
	303:20 A. Yes.		
	303:21 Q. And annualized insurance, there may		
	303:22 be savings in insurance because the -- those		
	303:23 who provide Uber's insurance perceive what		
	303:24 Uber's doing as increasing safety, right?		
	303:25 A. I'm not sure if the perception --		
	304:01 C. Dobbs - Highly Confidential		

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304:02	how important the perception is. I think it		
304:03	would be more so that the reflection of what		
304:04	actually happens on the platform and, you		
304:05	know, the number of accidents.		
304:06	Q. Okay. So, but annualized insurance		
304:07	savings is -- reflects insurance will be		
304:08	saved because an action may actually make the		
304:09	platform safer, right?		
304:10	A. Right. There could be fewer		
304:11	accidents on the platform as a result.		
304:12	Q. Or other issues on the platform,		
304:13	right?		
304:14	A. Potentially.		
304:15	Q. Okay. So you look at Annualized		
304:16	Insurance Savings and -- and that's in green.		
304:17	And then red is Annualized Expected Supply		
304:18	Replacement Costs, right?		
304:19	A. Yes.		
304:20	Q. And that means:		
304:21	Determining the approximate		
304:22	incentive cost for replacing miles that would		
304:23	be lost under various circumstances.		
304:24	Right?		
304:25	A. Yes. That's what that says.		
305:01	C. Dobbs - Highly Confidential		
305:02	Q. Okay. So when you start with the		
305:03	insurance savings, you subtract the annual		
305:04	expected supply replacement costs and you see		
305:05	if the result of that is a net cost or a net		
305:06	benefit to Uber, right?		
305:07	A. That's the framework that's		
305:08	outlined on this slide.		
305:09	Q. Okay. And what it says is:		
305:10	Moved forward with choices that		
305:11	were only a net benefit to Uber.		
305:12	Right?		
305:13	A. Right.		
305:14	Q. Okay. So the framework for making		
305:15	safety-related decisions, one of the tenets		
305:16	of that is move forward with a choice only if		
305:17	it's a net benefit to Uber, right?		

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DESIGNATION	SOURCE	DURATION	ID
305:19 - 305:22	Dobbs, Chad 2025-08-21 - PIP MP4 305:19 A. So, the framework that was laid out 305:20 here in 2018, you know, that's one of the 305:21 considerations that would go into making 305:22 decisions on this front.	00:00:15	DC_v6P.67
325:02 - 325:11	Dobbs, Chad 2025-08-21 - PIP MP4 325:02 Q. Okay. And it was created in 325:03 October 2021. 325:04 Do you see that? 325:05 A. Yes. 325:06 Q. Okay. And if you flip forward to 325:07 page 2 of the PDF, it says: 325:08 Uber Women's Safety & 325:09 Sustainability. 325:10 Right? 325:11 A. It does.	00:00:16	DC_v6P.68
326:10 - 326:20	Dobbs, Chad 2025-08-21 - PIP MP4 326:10 If you go to the second to last 326:11 bullet on this same slide, it says: 326:12 Short-term. 326:13 Uber has a clear objective of 326:14 building empathy and trust with women riders 326:15 by taking ownership, quote, promising further 326:16 action and providing more robust safety 326:17 features and driver enforcement on the 326:18 platform. 326:19 Do you see that? 326:20 A. I do.	00:00:26	DC_v6P.69
326:23 - 327:07	Dobbs, Chad 2025-08-21 - PIP MP4 326:23 What Uber is saying here is that 326:24 growing ridership among women is being 326:25 impacted by women's perceptions regarding 327:01 C. Dobbs - Highly Confidential 327:02 Uber's safety, right? 327:03 A. I believe some studies or surveys 327:04 were done that concluded that some women were 327:05 either not using ridesharing platforms or 327:06 using them less frequently due to either 327:07 perceptions or realities around safety.	00:00:34	DC_v6P.70

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DESIGNATION	SOURCE	DURATION	ID
328:07 - 329:10	Dobbs, Chad 2025-08-21 - PIP MP4	00:01:17	DC_v6P.71
328:07	Q. And so what the PowerPoint (edited)		
328:08	is dealing with here is just looking at how		
328:09	Uber is going to be messaging and using		
328:10	branding with respect to certain consumers,		
328:11	right?		
328:12	A. It appears so.		
328:13	Q. Okay. And focusing on riders, it		
328:14	identifies different target personas,		
328:15	potential target personas for its brand		
328:16	messaging.		
328:17	Do you see that?		
328:18	A. Yes, I do.		
328:19	Q. Okay. And it divides riders into		
328:20	women who are unemployed and women who are		
328:21	employed, right?		
328:22	A. It does.		
328:23	Q. And under Unemployed, it has		
328:24	students, correct?		
328:25	A. Yes.		
329:01	C. Dobbs - Highly Confidential		
329:02	Q. And then Housewives/Old Women.		
329:03	Do you see that?		
329:04	A. I do.		
329:05	Q. Do you -- do you happen to know		
329:06	what Uber considers to be old when it comes		
329:07	to women? Who are the old women?		
329:08	A. Fair question.		
329:09	I don't know. Not sure if there		
329:10	was a specific definition there.		
431:22 - 432:02	Dobbs, Chad 2025-08-21 - PIP MP4	00:00:12	DC_v6P.72
431:22	Q. Mr. Dobbs, I think you said (edited)		
431:23	in answer to your counsel's question, you		
431:24	talked about what brought you to Uber and		
431:25	what has motivated you to stick around for so		
432:01	C. Dobbs - Highly Confidential		
432:02	long, right?		
432:04 - 434:14	Dobbs, Chad 2025-08-21 - PIP MP4	00:02:22	DC_v6P.73
432:04	A. I did.		
432:05	Q. And I noticed that you didn't		

DC_v6P - DOBBS, CHAD - v06P_As-Played in Court 01/14/2026

DESIGNATION	SOURCE	DURATION	ID
432:06	mention the compensation that you received		
432:07	from Uber, did you?		
432:08	A. I did not explicitly go on about		
432:09	compensation.		
432:10	Q. What's your 2025 salary?		
432:11	A. About \$250,000.		
432:12	Q. Okay. And what was your salary in		
432:13	2024?		
432:14	A. A little bit less than that.		
432:15	Q. And what bonus did you receive?		
432:16	A. Around \$60,000.		
432:17	Q. And what stock options did you		
432:18	receive?		
432:19	A. I don't know the exact value, but		
432:20	something probably around 300- or \$400,000.		
432:21	Q. Okay. And are all the stock		
432:22	options vested?		
432:23	A. I guess what I'm referring to as		
432:24	the stock options, it would've vested in the		
432:25	year you asked about.		
433:01	C. Dobbs - Highly Confidential		
433:02	Q. Okay. So for stock options, do you		
433:03	have -- you have stock options that are		
433:04	vested, right?		
433:05	A. I do.		
433:06	Q. And what is the value of your		
433:07	options in Uber stock that have vested,		
433:08	total?		
433:09	A. Total over all time?		
433:10	Q. Yes.		
433:11	A. I've sold a number of those shares,		
433:12	so it's a little bit difficult to calculate		
433:13	because those have been sold at different		
433:14	values, but, you know, probably somewhere		
433:15	between 3 and \$5 million.		
433:16	Q. Okay. So 3 and \$5 million in stock		
433:17	options that have vested, some or all of		
433:18	which you've sold for cash, right?		
433:19	A. Some of which I've sold for cash.		
433:20	Q. Okay. You also have stock		
433:21	options -- options in Uber stock that have		

DC_v6P - DOBBS, CHAD - v06P_As-Played in Court 01/14/2026

DESIGNATION	SOURCE	DURATION	ID
	433:22	not vested, right?	
	433:23	A. Technically they're not options	
	433:24	anymore, but it's equity that has not yet	
	433:25	vested.	
	434:01	C. Dobbs - Highly Confidential	
	434:02	Q. And what's the value of that?	
	434:03	A. It depends on the future stock	
	434:04	price what the exact value will be.	
	434:05	Q. What is the value estimated today?	
	434:06	A. I think the value estimated today	
	434:07	of the future vesting equity is probably a	
	434:08	little over a million dollars.	
	434:09	Q. Okay. And in order for you to	
	434:10	obtain that million dollars, you have to stay	
	434:11	at Uber, correct?	
	434:12	A. If I wanted to obtain some or all	
	434:13	of that million dollars, I would need to stay	
	434:14	at Uber.	

PLF Affirmative	00:31:30
DEF Counter	00:07:12
TOTAL RUN TIME	00:38:43