

COURT EXHIBIT 15A

Designation Run Report for Andrew Hasbun
as played in Court 1/15/2026 (April 10-11, 2025)

HASBUN, ANDREW- v11p - As-Played in Court 01/15/26

Designation List Report

 Hasbun, Andrew	2025-04-10
Hasbun, Andrew	2025-04-10
Hasbun, Andrew	2025-04-11
Hasbun, Andrew	2025-04-11

PLF Affirmative	00:59:54
PLF Counter	00:08:46
DEF Counter	00:25:06
TOTAL RUN TIME	01:33:46



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DESIGNATION	SOURCE	DURATION	ID
13:17 - 13:18	Hasbun, Andrew 2025-04-10 - PIP MP4 13:17 Q. Could you please state your name, sir? 13:18 A. Andrew Hasbun.	00:00:03	AH_v11p.1
14:01 - 14:09	Hasbun, Andrew 2025-04-10 - PIP MP4 14:01 Q. And you understand that you're here today 14:02 to give sworn testimony in those lawsuits against 14:03 Uber, correct? 14:04 A. Yes. 14:05 Q. You understand that your deposition 14:06 testimony here today is essentially the same as if 14:07 it was -- live in a courtroom for a judge, a jury, 14:08 or both, correct? 14:09 A. Yes.	00:00:16	AH_v11p.2
19:09 - 19:10	Hasbun, Andrew 2025-04-10 - PIP MP4 19:09 Q. Mr. Hasbun, who is your current employer? 19:10 A. Uber.	00:00:04	AH_v11p.3
19:13 - 19:17	Hasbun, Andrew 2025-04-10 - PIP MP4 19:13 Q. And that is the defendant in this case, 19:14 correct? 19:15 A. Correct. 19:16 Q. What's your current title at Uber? 19:17 A. Director of communications.	00:00:09	AH_v11p.4
19:18 - 19:21	Hasbun, Andrew 2025-04-10 - PIP MP4 19:18 Q. Anything more specific than director of 19:19 communications, or is it just director of 19:20 communications? 19:21 A. Safety communications.	00:00:07	AH_v11p.5
24:13 - 24:16	Hasbun, Andrew 2025-04-10 - PIP MP4 24:13 Q. And it shows that you went to the 24:14 University of Southern California for your 24:15 undergraduate degree? 24:16 A. That's correct.	00:00:06	AH_v11p.6
24:19 - 24:22	Hasbun, Andrew 2025-04-10 - PIP MP4 24:19 Q. It says here you majored in broadcast 24:20 journalism and political science. Was that a double 24:21 major? 24:22 A. Yes.	00:00:06	AH_v11p.7
24:23 - 25:18	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:51	AH_v11p.8

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DESIGNATION	SOURCE	DURATION	ID
	24:23 Q. Now, there were a couple of other 24:24 questions I had about some discrepancies here in 24:25 your LinkedIn profile, but before we get to those, 25:01 if we go back to the first page here, the summary, 25:02 can you read what you wrote there for the summary, 25:03 out loud? 25:04 A. "Experienced crisis, corporate, and 25:05 consumer communications professional with over 20 25:06 years in media and public relations. A versatile 25:07 strategist and passionate advocate, I've guided 25:08 executives through high-stakes crises and led 25:09 proactive, long-term campaigns and excel at driving 25:10 internal teams to enhance the consumer experience, 25:11 and ensuring seamless and impactful external 25:12 launches with maximum media exposure." 25:13 Q. Now, where you've written here that "I 25:14 have guided executives through high-stakes 25:15 crises" -- that's what you wrote, correct? 25:16 A. Mm-hmm. 25:17 Q. Is that a "yes"? 25:18 A. That's a "yes."		AH_v11p.8
25:20 - 25:23	Hasbun, Andrew 2025-04-10 - PIP MP4 25:20 When you wrote that, about (edited) 25:21 guiding executives through high-stakes crises, 25:22 you've only done that at Uber, correct? 25:23 A. Correct.	00:00:09	AH_v11p.9
26:03 - 26:08	Hasbun, Andrew 2025-04-10 - PIP MP4 26:03 Q. Before you worked at Uber, you were a 26:04 television news reporter, right? 26:05 A. Correct. 26:06 Q. And that's been the extent of your 26:07 professional career, right? 26:08 A. Yes.	00:00:12	AH_v11p.10
26:12 - 26:17	Hasbun, Andrew 2025-04-10 - PIP MP4 26:12 Q. What high -- how many high-stakes crises 26:13 have you guided Uber executives through in your time 26:14 at Uber? 26:15 A. I couldn't give you a number. 26:16 Q. Because it's so many? 26:17 A. Correct.	00:00:13	AH_v11p.11

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DESIGNATION	SOURCE	DURATION	ID
35:03 - 35:19	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:46	AH_v11p.12
35:03	Q. I don't know if it's in your <small>(edited)</small>		
35:04	LinkedIn or I've just seen it somewhere else, but		
35:05	your current title is director of communications,		
35:06	and I've seen something about the head of global		
35:07	safety communications. Is that right?		
35:08	A. Correct.		
35:09	Q. All right. And that's been your job since		
35:10	February of 2020, right?		
35:11	A. Correct.		
35:12	Q. What does that mean exactly?		
35:13	A. That means I handle all of our safety and		
35:14	customer support issues that arise in the media, as		
35:15	well as all of our proactive safety features and		
35:16	safety policies and how we communicate that to the		
35:17	public. My main responsibility is dealing with		
35:18	press and media, and communicating these things to		
35:19	press and media.		
35:20 - 35:23	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:09	AH_v11p.13
35:20	Q. And your work with press and media, that's		
35:21	been the work that you've done, really primarily		
35:22	focused, since you've been at Uber, right?		
35:23	A. Correct.		
36:05 - 36:11	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:14	AH_v11p.14
36:05	Q. Who do you currently report to?		
36:06	A. Brooke Anderson.		
36:07	Q. And what's her title?		
36:08	A. Senior director.		
36:09	Q. Anything more specific than senior		
36:10	director?		
36:11	A. Product communications.		
36:12 - 36:21	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:21	AH_v11p.15
36:12	Q. How long have you reported to		
36:13	Ms. Anderson?		
36:14	A. The entire time I've been at Uber.		
36:15	Q. So as you've moved up, she's moved up too;		
36:16	is that right?		
36:17	A. Correct.		
36:18	Q. Who does Ms. Anderson currently report to?		

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DESIGNATION	SOURCE	DURATION	ID
	36:19 A. Matt Kallman.		
	36:20 Q. What Matt -- what's Matt Kallman's title?		
	36:21 A. He's the vice president of communications.		
51:24 - 52:05	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:16	AH_v11p.16
	51:24 Q. Sexual assault is an unwanted sexual		
	51:25 experience that involves physical contact, correct?		
	52:01 A. Correct.		
	52:02 Q. Sexual misconduct is an unwanted sexual		
	52:03 experience that does not involve physical contact,		
	52:04 correct?		
	52:05 A. Correct.		
53:10 - 53:25	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:31	AH_v11p.17
	53:10 Q. Okay. So do you agree that in 2018, Uber		
	53:11 faced an imperative to collect its customers'		
	53:12 complaints of a sexual nature to improve safety in		
	53:13 its business?		
	53:14 A. Yes.		
	53:15 Q. To measure those complaints?		
	53:16 A. Yes.		
	53:17 Q. To respond appropriately to those		
	53:18 complaints?		
	53:19 A. Yes.		
	53:20 Q. And that doing so would improve safety in		
	53:21 Uber's business?		
	53:22 A. Yes.		
	53:23 Q. Do you agree that people have a right to		
	53:24 know the safety records of the companies and		
	53:25 organizations they rely on every day?		
54:02 - 54:04	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:02	AH_v11p.18
	54:02 BY MR. MELUGIN:		
	54:03 Q. You can answer.		
	54:04 A. Yes.		
54:15 - 54:18	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:11	AH_v11p.19
	54:15 Q. That before a woman takes an Uber, she has		
	54:16 the right to know her risk of suffering sexual		
	54:17 violence committed by an Uber driver.		
	54:18 A. That risk exists everywhere.		
54:20 - 54:23	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:07	AH_v11p.20
	54:20 do you (edited)		

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DESIGNATION	SOURCE	DURATION	ID
	54:21 agree that before a woman takes an Uber, she has the		
	54:22 right to know her risk of suffering sexual violence		
	54:23 committed by an Uber driver?		
54:25 - 55:01	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:04	AH_v11p.21
	54:25 THE WITNESS: I believe that the woman		
	55:01 taking the Uber knows the risk.		
58:15 - 58:15	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:04	AH_v11p.22
	58:15 Q. Do you recognize Exhibit 3, Mr. Hasbun?		
58:16 - 58:21	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:12	AH_v11p.23
	58:16 A. Yes, I do.		
	58:17 Q. And what is Exhibit 3?		
	58:18 A. This is Uber's US Safety Report.		
	58:19 Q. That's the first Safety Report that Uber		
	58:20 ever published, correct?		
	58:21 A. That's correct.		
60:05 - 60:14	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:25	AH_v11p.24
	60:05 Q. And do you see that third full paragraph,		
	60:06 where it says, "People have a right to know"?		
	60:07 A. I do.		
	60:08 Q. Can you read that, please?		
	60:09 A. "People have a right to know about the		
	60:10 safety records of the companies and organizations		
	60:11 they rely on every day. And we believe that		
	60:12 publishing this data will help us develop best		
	60:13 practices that will prevent serious safety incidents		
	60:14 from occurring in the first place."		
61:24 - 62:01	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:05	AH_v11p.25
	61:24 Q. You agree that corporate secrecy won't		
	61:25 make anyone safer, right?		
	62:01 A. I do.		
62:13 - 63:14	Hasbun, Andrew 2025-04-10 - PIP MP4	00:01:02	AH_v11p.26
	62:13 Q. What do you understand a conduit to be?		
	62:14 A. A conduit is someone who passes --		
	62:15 information -- things pass through a conduit.		
	62:16 Q. Things pass through a conduit, right?		
	62:17 Un- -- untrammelled, right?		
	62:18 A. Correct.		
	62:19 Q. You know what a filter is, right?		
	62:20 A. Yes.		

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DESIGNATION	SOURCE	DURATION	ID
	62:21 Q. And that's different than a conduit,		
	62:22 right?		
	62:23 A. Correct.		
	62:24 Q. That blocks things from passing through a		
	62:25 filter, right?		
	63:01 A. I actually disagree with that.		
	63:02 Q. Okay. What do you -- how do you disagree?		
	63:03 A. We're not here to argue about the		
	63:04 definition of a filter.		
	63:05 Q. I want to know how you disagree.		
	63:06 A. I disagree with the characterization that		
	63:07 you're making about that I'm a conduit or a filter		
	63:08 of information. What my job is is to correct the		
	63:09 record with reporters, to set the record straight,		
	63:10 to correct the facts, to talk to reporters and, yes,		
	63:11 filter information going back and forth to make sure		
	63:12 that it is correct and accurate.		
	63:13 Q. Blocking things that you think need to be		
	63:14 blocked, right?		
63:17 - 63:17	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:02	AH_v11p.27
	63:17 Q. That's what a filter does, right?		
63:19 - 64:01	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:16	AH_v11p.28
	63:19 BY MR. MELUGIN:		
	63:20 Q. Prevents things from passing through that		
	63:21 shouldn't pass through, right?		
	63:22 A. Depends on the context.		
	63:23 Q. You agree that's what a filter does. I'm		
	63:24 not asking you about any particular context. A		
	63:25 filter prevents things from going through that		
	64:01 shouldn't, right?		
64:06 - 64:10	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:11	AH_v11p.29
	64:06 A. That's what something like a water filter		
	64:07 does, yes.		
	64:08 Q. That's what any filter does, right?		
	64:09 That's what a -- filtering means that you separate		
	64:10 things, right?		
64:14 - 64:15	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:03	AH_v11p.30
	64:14 A. Yes, that is Webster's definition of a		
	64:15 filter.		

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DESIGNATION	SOURCE	DURATION	ID
64:22 - 64:24	Hasbun, Andrew 2025-04-10 - WIT MP4 64:22 Q. To be clear, you disagreed that the 64:23 characterization of your job was to be a filter, not 64:24 a conduit, right?	00:00:07	AH_v11p.31
65:01 - 65:03	Hasbun, Andrew 2025-04-10 - WIT MP4 65:01 THE WITNESS: Depends on the context. 65:02 (Whereupon Exhibit JCCP 2705/MDL 561 was 65:03 marked for identification.)	00:00:02	AH_v11p.32
65:04 - 65:15	Hasbun, Andrew 2025-04-10 - PIP MP4 65:04 BY MR. MELUGIN: 65:05 Q. Mr. Hasbun, you've been handed a document 65:06 that's been marked as Exhibit No. 2705. It is a -- 65:07 it's a Slack chat or a G-Chat between you and 65:08 Ms. Jodi Page, correct? 65:09 A. Correct. 65:10 Q. And it is from October 1st, 2018, or at 65:11 least that's the first date in this collection of 65:12 Slack chat, correct? 65:13 A. Correct. 65:14 Q. And runs through October 6th, 2018, 65:15 correct?	00:00:30	AH_v11p.33
65:16 - 65:16	Hasbun, Andrew 2025-04-10 - PIP MP4 65:16 A. Correct.	00:00:01	AH_v11p.34
65:22 - 65:22	Hasbun, Andrew 2025-04-10 - WIT MP4 65:22 Q. Let's go to the page ending (edited)	00:00:04	AH_v11p.35
65:23 - 66:02	Hasbun, Andrew 2025-04-10 - WIT MP4 65:23 250. Now, can you read there what you wrote? The 65:24 first thing that appears is the statement there made 65:25 by Ms. Page from the page before that says, "I was 66:01 like rage rage rage rage." See that at the top? 66:02 A. I do.	00:00:17	AH_v11p.36
67:07 - 67:21	Hasbun, Andrew 2025-04-10 - PIP MP4 67:07 Q. Page ending 250, the first two statements 67:08 you made there here in Exhibit 2705, could you read 67:09 those, please? 67:10 A. "Um, let's see. If the guy has multiple 67:11 complaints about sexual assaults we don't say a 67:12 word. If he has none, we say 'wow this was such a	00:00:40	AH_v11p.37

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	67:13 surprise we didn't have any previous feedback like		
	67:14 this.' They just don't get it. We're not a conduit		
	67:15 for information. We are a filter."		
	67:16 Q. Do you agree Uber ride -- excuse me. Do		
	67:17 you agree Uber should transport its passengers		
	67:18 safely?		
	67:19 A. Yes, I do.		
	67:20 Q. Uber rides should be safe, right?		
	67:21 A. Yes.		
67:20 - 67:21	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:03	AH_v11p.38
	67:20 Q. Uber rides should be safe, right?		
	67:21 A. Yes.		
67:22 - 67:25	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:12	AH_v11p.39
	67:22 Q. But not all Uber rides are safe, right?		
	67:23 A. The vast majority of Uber rides are safe.		
	67:24 There are some serious incidents that happen on our		
	67:25 platform.		
68:09 - 68:12	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:08	AH_v11p.40
	68:09 Q. But because it's not all Uber rides, you		
	68:10 can agree that some are not safe, correct?		
	68:11 A. There are some Uber rides where things go		
	68:12 wrong, yes.		
68:18 - 68:20	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:04	AH_v11p.41
	68:18 Q. Okay. So you agree that passenger safety		
	68:19 should be Uber's top priority, right?		
	68:20 A. Yes.		
69:16 - 69:25	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:26	AH_v11p.42
	69:16 Q. Should providing a safe ride be (edited)		
	69:17 Uber's most important goal?		
	69:18 A. Yes.		
	69:19 Q. Do you agree that a safe ride includes a		
	69:20 trip without sexual violence?		
	69:21 A. Yes.		
	69:22 Q. Do you agree that a passenger being		
	69:23 sexually assaulted by the driver makes a ride		
	69:24 unsafe?		
	69:25 A. Yes.		
74:02 - 74:04	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:08	AH_v11p.43
	74:02 Q. Do you agree safety is an elemental,		

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DESIGNATION	SOURCE	DURATION	ID
	74:03 fundamental human need, as elemental as the air we 74:04 breathe and the water we drink?		
74:06 - 74:06	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:02	AH_v11p.44
	74:06 THE WITNESS: Yes.		
82:20 - 82:21	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:04	AH_v11p.45
	82:20 Q. Mr. Hasbun, you agree Uber has a sexual 82:21 assault problem, correct?		
82:23 - 83:05	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:12	AH_v11p.46
	82:23 THE WITNESS: I believe that one sexual 82:24 assault is one too many. 82:25		
	83:01 BY MR. MELUGIN:		
	83:02 Q. Okay. That's not my question, Mr. Hasbun, 83:03 so I'm going to object as nonresponsive. My 83:04 question is, you agree that Uber has a sexual 83:05 assault problem?		
83:07 - 83:10	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:14	AH_v11p.47
	83:07 THE WITNESS: One sexual assault is 83:08 problematic. I think, looking at it in its 83:09 totality, this is an extremely rare occurrence on 83:10 the platform.		
84:23 - 84:25	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:04	AH_v11p.48
	84:23 This is going to be Exhibit 2707. 84:24 (Whereupon Exhibit JCCP 2707/MDL 563 was 84:25 marked for identification.)		
85:02 - 85:06	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:15	AH_v11p.49
	85:02 Q. Mr. Hasbun, I've handed you a document 85:03 that's marked as Exhibit 2707. This is another 85:04 Slack chat between you and Brooke Anderson, correct? 85:05 A. Can I take a second to look over it? I 85:06 believe it is.		
85:12 - 85:13	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:06	AH_v11p.50
	85:12 Q. Okay. From August of 2018, right? 85:13 A. Yes.		
85:20 - 86:18	Hasbun, Andrew 2025-04-10 - WIT MP4	00:01:09	AH_v11p.51
	85:20 Q. Now, I'm going to direct your attention 85:21 here in Exhibit 2707 to the page marked 908 -- 85:22 ending 908. And about halfway down -- well,		

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DESIGNATION	SOURCE	DURATION	ID
	85:23 starting in the middle -- I guess the second quarter		
	85:24 of the page, so top half, second quarter, Brooke		
	85:25 Anderson says, "Do you think deter wrongdoing is too		
	86:01 harsh?" Do you see that?		
	86:02 A. Yes.		
	86:03 Q. And she says, "My thought was that we		
	86:04 needed to better articulate what shining a light is		
	86:05 about." And then she writes, "Correct," right?		
	86:06 A. Yes.		
	86:07 Q. Okay. What's the -- what is it you wrote		
	86:08 after that?		
	86:09 A. "I'm with you" --		
	86:10 Q. The entirety of that comment. What did		
	86:11 you write after that?		
	86:12 A. "I'm with you. No I don't. We have a		
	86:13 sexual assault problem. Let's stop pretending like		
	86:14 we are trying to battle pick pockets and petty		
	86:15 crime."		
	86:16 Q. Okay. So August 24th, 2018, you said,		
	86:17 "We" -- "we" being Uber, right?		
	86:18 A. Correct.		
86:21 - 86:24	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:12	AH_v11p.52
	86:21 Q. "Uber, we, have a sexual assault problem,"		
	86:22 correct? That's what you wrote on August 24th,		
	86:23 2018, correct?		
	86:24 A. That's what's in this document.		
87:05 - 87:07	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:13	AH_v11p.53
	87:05 Q. And now, the truth is, when it comes to		
	87:06 passengers facing crises, Uber doesn't really help		
	87:07 them, right?		
87:09 - 87:09	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:01	AH_v11p.54
	87:09 THE WITNESS: I disagree.		
87:17 - 87:21	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:17	AH_v11p.55
	87:17 Q. So here in Exhibit 2707, the same one that		
	87:18 you were looking at that we just -- I just asked you		
	87:19 about, the very next page is the one that's marked		
	87:20 911 -- ending in 911, correct?		
	87:21 A. I'm on it. That's correct. I'm on 911.		
87:22 - 88:22	Hasbun, Andrew 2025-04-10 - PIP MP4	00:01:07	AH_v11p.56

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DESIGNATION	SOURCE	DURATION	ID
	87:22 Q. Brooke writes, "Another Q." You see that 87:23 right in the middle of the page? 87:24 A. Yes. 87:25 Q. "We're saying this gives you tools to 88:01 quickly get help. The idea of changing to, quote, 88:02 offer you assistance, end quote. I like offering 88:03 assistance which is more responsibility and 88:04 stronger. But are we over promising by saying 88:05 that?" Do you see that? 88:06 A. I do. 88:07 Q. She goes on to say, "It sounds like we're 88:08 going to do something, but we just say, hey call 88:09 911. Here's how you call insurance company. Here's 88:10 how to report this to Uber." Right? 88:11 A. Yes, I'm following. 88:12 Q. That's correct? That's what she wrote? 88:13 A. Correct. 88:14 Q. She goes on to say, "Is it misleading to 88:15 say offer assistance? Does/doesn't that indicate 88:16 that we are going to maybe pop up in an ambulance or 88:17 something? What do you think?" And then what did 88:18 you write? 88:19 A. I wrote, "I like what we initially wrote. 88:20 Give you the tools to get help. The truth is we 88:21 aren't helping. You help yourself with the tools we 88:22 give you."		AH_v11p.56
88:23 - 89:09	Hasbun, Andrew 2025-04-10 - PIP MP4 88:23 Q. So you wrote, "The truth is we, Uber, 88:24 aren't helping," right? 88:25 A. The context of this conversation is 89:01 important. 89:02 Q. Mr. Hasbun, my question is simply whether 89:03 you wrote that statement that says "The truth is we 89:04 aren't helping," right? 89:05 A. In the context of this conversation and 89:06 with the product feature that we're referring to, we 89:07 send the rider a message in the app asking if 89:08 they're okay, and they choose what kind of help that 89:09 they need.	00:00:28	AH_v11p.57
89:11 - 89:25	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:37	AH_v11p.58

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DESIGNATION	SOURCE	DURATION	ID
	89:11 My question is simply that you wrote (edited)		AH_v11p.58
	89:12 here on this page ending 912 in Exhibit 2707 that		
	89:13 "The truth is we aren't helping. You help yourself		
	89:14 with the tools we give you." That's what you wrote,		
	89:15 correct?		
	89:16 A. That is what I wrote.		
	89:17 Q. And you go on to say, "Assistance is		
	89:18 misleading," right?		
	89:19 A. That is what I wrote.		
	89:20 Q. And then you say, "We don't assist,"		
	89:21 right?		
	89:22 A. I wrote, "We don't assist."		
	89:23 Q. Right. And Ms. Anderson wrote back to		
	89:24 say, "Totally agree. Moving right along." Right?		
	89:25 A. Correct. That's what's written down here.		
100:10 - 100:23	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:37	AH_v11p.59
	100:10 Can you read the very first sentence and the second		
	100:11 sentence there under "Considerations." The very top		
	100:12 of the page there.		
	100:13 A. Starting with, "How, then"?		
	100:14 Q. "How, then," the question and the answer.		
	100:15 A. "How, then, can a business that wants the		
	100:16 public to trust that it is sincere and honest in its		
	100:17 efforts to address sexual violence communicate those		
	100:18 values in a transparency publication? The simple		
	100:19 answer is to be transparent."		
	100:20 Q. So if a business wants the public to trust		
	100:21 that it is sincere and honest in its efforts to		
	100:22 address sexual violence, then it must be		
	100:23 transparent, right?		
100:25 - 101:01	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:04	AH_v11p.60
	100:25 THE WITNESS: That's -- that's what's		
	101:01 written in here, and I agree.		
101:17 - 101:23	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:18	AH_v11p.61
	101:17 Q. Okay. Well, can you read the bolded print		
	101:18 there that says, "It is." Just the bolded print.		
	101:19 A. "It is important to remember that the most		
	101:20 threatening experience after the violence itself is		
	101:21 not being believed about the violence experienced."		
	101:22 Q. Do you agree with that?		

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DESIGNATION	SOURCE	DURATION	ID
	101:23 A. I do.		
104:06 - 104:11	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:16	AH_v11p.62
	104:06 Q. Do you agree that Uber has never made		
	104:07 public its complete statistics for total sexual		
	104:08 violence incidents that have been reported to Uber?		
	104:09 A. According to this definition, we have not		
	104:10 made public this entire definition of "sexual		
	104:11 violence." We have made public the top five		
104:12 - 104:13	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:07	AH_v11p.63
	104:12 categories of sexual assault that was agreed upon		
	104:13 and advised by experts are the top five categories.		
130:04 - 130:05	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:03	AH_v11p.64
	130:04 Q. Mr. Hasbun, you've been handed		
	130:05 Exhibit 618. (edited)		
138:04 - 138:11	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:25	AH_v11p.65
	138:04 Page 688. This is within Exhibit 618. It says,		
	138:05 "Prep plan to handle. Determine media response		
	138:06 based on the facts at hands." Excuse me.		
	138:07 "Determine media response based on the facts at		
	138:08 hand." Can you read the first sentence under the		
	138:09 first bullet point there?		
	138:10 A. "In many cases, we can and should squash		
	138:11 stories."		
138:12 - 138:12	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:02	AH_v11p.66
	138:12 Q. And that means to end stories, correct?		
138:14 - 138:17	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:13	AH_v11p.67
	138:14 THE WITNESS: The end result of conveying		
	138:15 facts, as the second sentence says, the facts may be		
	138:16 unclear or potentially wrong. That may result in a		
	138:17 story not airing, because it wouldn't be accurate.		
138:20 - 138:21	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:06	AH_v11p.68
	138:20 My question is simply that squashing (edited)		
	138:21 a story means the story never airs, right?		
138:23 - 138:24	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:04	AH_v11p.69
	138:23 THE WITNESS: A squashed story means that		
	138:24 the story doesn't air.		
141:17 - 141:19	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:04	AH_v11p.70

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DESIGNATION	SOURCE	DURATION	ID
	141:17 MR. MELUGIN: Let's go to Exhibit 617. 141:18 (Whereupon Exhibit JCCP 617/MDL 564 was 141:19 marked for identification.)		AH_v11p.70
141:21 - 142:06	Hasbun, Andrew 2025-04-10 - PIP MP4 141:21 Q. Mr. Hasbun, you've been handed what's been 141:22 marked as Exhibit 617. It is a document titled 141:23 "Safety H2 Plan 2016." So you can see from the 141:24 metadata sheet it was created a little bit before 141:25 you joined Uber, but last updated within your first 142:01 year there. It was last updated on July 7th, 20-- 142:02 excuse me -- July 11th, 2017, right? 142:03 A. Yes, that's what the metadata shows. 142:04 Q. And again, another document written by 142:05 Brooke Anderson, according to the metadata, right? 142:06 A. Yes.	00:00:42	AH_v11p.71
144:20 - 144:24	Hasbun, Andrew 2025-04-10 - PIP MP4 144:20 Q. And the first thing here (edited) 144:21 that's written after "Context," can you read that 144:22 first sentence, please? 144:23 A. "Safety is our largest reputational 144:24 challenge."	00:00:11	AH_v11p.72
145:09 - 145:13	Hasbun, Andrew 2025-04-10 - PIP MP4 145:09 Q. And what this document goes on to (edited) 145:10 say in the same paragraph is, "We need to build a 145:11 strong foundation of positive and proactive safety 145:12 PR to strengthen and turn the corner on this 145:13 narrative." Right?	00:00:13	AH_v11p.73
145:19 - 145:19	Hasbun, Andrew 2025-04-10 - PIP MP4 145:19 THE WITNESS: Yes, I've read it.	00:00:02	AH_v11p.74
146:01 - 146:14	Hasbun, Andrew 2025-04-10 - PIP MP4 146:01 Q. "The challenge will be doing so" -- excuse 146:02 me. "The challenge will be doing that amidst the 146:03 daily grind of responding to incidents," right? 146:04 That's the next thing that's written there in this 146:05 Safety Comms Plan? 146:06 A. Correct. 146:07 Q. And the first objective is "Stabilize and 146:08 neutralize," right? 146:09 A. Yes.	00:00:37	AH_v11p.75

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DESIGNATION	SOURCE	DURATION	ID
	146:10 Q. Goes on to write, "Handle tough stories		
	146:11 professionally, kill stories when possible and		
	146:12 mitigate the impact of incidents on our reputation."		
	146:13 Right?		
	146:14 A. That's what it says.		
146:15 - 146:16	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:07	AH_v11p.76
	146:15 Q. And "kill stories" means if something is		
	146:16 going to damage our reputation, kill it?		
146:19 - 147:03	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:35	AH_v11p.77
	146:19 Q. Make sure it doesn't run, if you can,		
	146:20 right?		
	146:21 A. Not necessarily. "Kill stories" means		
	146:22 correct misinformation, correct facts, explain facts		
	146:23 to a reporter, explain what the situation is, and		
	146:24 oftentimes the facts don't end up being exactly what		
	146:25 the reporter initially wrote in about, and so		
	147:01 stories don't air, stories don't happen. That's		
	147:02 just the natural state of the business. Words like		
	147:03 "kill" and "squash" are industry jargon.		
148:02 - 148:13	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:29	AH_v11p.78
	148:02 Q. "Strategy: Build Relationships." Do you		
	148:03 see that numbered paragraph there, the Roman numeral		
	148:04 II?		
	148:05 A. Yes.		
	148:06 Q. "Uber has an educational and trust		
	148:07 deficit - national influencers don't know if they		
	148:08 can trust the company and many don't understand our		
	148:09 tech features," is what she's written, correct?		
	148:10 A. Yes.		
	148:11 Q. "We haven't shared much data pertaining to		
	148:12 safety, so we're still a black box." Right?		
	148:13 A. That's what's written.		
149:12 - 149:14	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:06	AH_v11p.79
	149:12 MR. MELUGIN: Let's go to Exhibit 2015.		
	149:13 (Whereupon Exhibit JCCP 2015/MDL 370 was		
	149:14 marked for identification.)		
149:15 - 149:20	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:19	AH_v11p.80
	149:15 BY MR. MELUGIN:		
	149:16 Q. Mr. Hasbun, you've been handed		

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DESIGNATION	SOURCE	DURATION	ID
	149:17 Exhibit 2015. It is a document the first page of 149:18 which ends in Bates label 3252, and runs 149:19 consecutively to 3252.005. It's a six-page 149:20 document, correct?		
149:21 - 149:21	Hasbun, Andrew 2025-04-10 - PIP MP4 149:21 A. Did you say 005? Yes.	00:00:04	AH_v11p.81
149:22 - 150:04	Hasbun, Andrew 2025-04-10 - PIP MP4 149:22 Q. And this is called the "Right to Safety 149:23 Plan," right? 149:24 A. Yes. 149:25 Q. And the background begins, "Increasingly 150:01 around" -- "Increasingly around the world, our 150:02 opponents are citing women's safety as a reason why 150:03 Uber is bad for their communities," right? 150:04 A. That is what it says.	00:00:19	AH_v11p.82
150:05 - 150:21	Hasbun, Andrew 2025-04-10 - PIP MP4 150:05 Q. "The perception that Uber is unsafe for 150:06 women has been a significant issue for policy and 150:07 PR." Right? And then goes on to identify places in 150:08 which that's been a problem, right? 150:09 A. Yes. 150:10 Q. And what the objective on this right to 150:11 safety plan is is to "Elevate women's safety 150:12 discussion as a systemic issue beyond Uber so that 150:13 it will be harder for opponents to build alliances 150:14 with women's groups and argue that Uber is dangerous 150:15 (or that fingerprinting and/or women-only services 150:16 make women safer)," right? 150:17 A. That's what it says. 150:18 Q. And that's also what you did earlier today 150:19 when I asked you about sexual assaults, was you 150:20 identified it as a systemic issue, and that Uber's 150:21 not immune to it, right?	00:00:52	AH_v11p.83
150:23 - 150:24	Hasbun, Andrew 2025-04-10 - PIP MP4 150:23 THE WITNESS: That is what I said. It is 150:24 a systemic issue.	00:00:07	AH_v11p.84
151:02 - 151:10	Hasbun, Andrew 2025-04-10 - PIP MP4 151:02 Q. Your statements today are part of the same 151:03 objective, right?	00:00:31	AH_v11p.85

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DESIGNATION	SOURCE	DURATION	ID
	151:04 A. I have never seen this document before, so		
	151:05 I -- to somehow lump me in that this has somehow		
	151:06 prompted my opinion would not be correct. I have		
	151:07 never seen this before. This document was produced		
	151:08 in 2016, before my time at Uber, and I don't recall		
	151:09 ever seeing it. So if you're asking do I believe		
	151:10 sexual assault is a systemic issue, yes, I do.		
210:03 - 210:04	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:04	AH_v11p.86
	210:03 Q. Mr. Hasbun, I've just handed you what's		
	210:04 been labeled as Exhibit 2713. (edited)		
210:11 - 211:01	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:46	AH_v11p.87
	210:11 Q. So on January 10th, Tracey (edited)		
	210:12 writes, "Jill and Aaron." That's Jill Hazelbaker,		
	210:13 right?		
	210:14 A. Correct.		
	210:15 Q. And Aaron McLear?		
	210:16 A. Yes, I believe so.		
	210:17 Q. "I have been told that you have decided		
	210:18 you want me to do an on-camera interview with CNN.		
	210:19 After three separate hour long phone conversations		
	210:20 and a dozen e-mail exchanges with CNN, answering		
	210:21 their questions and listening to their responses, I		
	210:22 strongly feel that this is not a good idea for me or		
	210:23 any Uber executive or spokesperson to go on camera		
	210:24 with CNN for an extended interview with their		
	210:25 investigative reporter Drew Griffin." Correct?		
	211:01 A. That's what's written.		
211:16 - 212:14	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:49	AH_v11p.88
	211:16 Q. She writes, "We have no good responses to		
	211:17 the CNN number - 92," right?		
	211:18 A. Yes, that's what's written here.		
	211:19 Q. And that's a reference to the 92 sexual		
	211:20 assaults perpetrated by drivers on Uber passengers,		
	211:21 right?		
	211:22 A. Yes. Well, that's the number that CNN		
	211:23 found, yes.		
	211:24 Q. Right. Because that's not really the		
	211:25 number, right? Uber's number's much higher than		
	212:01 that, is what I'm getting at, correct?		
	212:02 A. That's the number CNN found, if that's		

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DESIGNATION	SOURCE	DURATION	ID
	212:03 what you're asking. That's what's in the document.		
	212:04 Q. Right. No, that's the reference to the		
	212:05 CNN number that they found --		
	212:06 A. Correct.		
	212:07 Q. -- correct? That's not the actual number		
	212:08 for Uber because Uber's number's actually much, much		
	212:09 higher than that, correct?		
	212:10 A. The actual number for Uber is in the		
	212:11 Safety Report.		
	212:12 Q. Okay. Well, the Safety Report's almost		
	212:13 two years away, right?		
	212:14 A. Yes.		
212:19 - 213:08	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:45	AH_v11p.89
	212:19 Q. What she goes on to write is, "We have not		
	212:20 released any numbers and are explanations of why are		
	212:21 weak," right?		
	212:22 A. That's what she wrote.		
	212:23 Q. "We have avoided being pressed on this		
	212:24 issue. CNN will be pressing us on our data. Even		
	212:25 some of our partners agree there is nothing positive		
	213:01 we can say to 92 people being sexually assaulted."		
	213:02 Right?		
	213:03 A. That is what is written here.		
	213:04 Q. And she again goes on to write, in bolded		
	213:05 print this time, the very next bullet point, "The		
	213:06 actual number is significantly higher and there is		
	213:07 no good way to address the number." Right?		
	213:08 A. That's what's written here.		
214:15 - 214:18	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:09	AH_v11p.90
	214:15 Q. She writes, "Any complaints to CNN		
	214:16 leadership, including two cease and desist orders,		
	214:17 fell on deaf ears," right?		
	214:18 A. That's what's written here.		
216:01 - 216:10	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:28	AH_v11p.91
	216:01 Q. Ms. Breeden writes, "We currently have a		
	216:02 strategy in place that was designed back in November		
	216:03 that we would hold off on giving specific		
	216:04 transparency numbers on sexual assault until April.		
	216:05 In April, which is sexual assault awareness month,		
	216:06 we would release the numbers, announce our		

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DESIGNATION	SOURCE	DURATION	ID
	216:07 additional educational efforts, and offer up an 216:08 executive for interviews with friendly outlets." 216:09 Right? 216:10 A. That's what's written.		
216:11 - 216:15	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:20	AH_v11p.92
	216:11 Q. Okay. So the plan that Uber had put in 216:12 place in November, when CNN first started 216:13 investigating this story, was that Uber would hold 216:14 off on giving specific transparency numbers on 216:15 sexual assault until the following April, right?		
216:17 - 216:18	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:03	AH_v11p.93
	216:17 THE WITNESS: I don't know what plan 216:18 Tracey is referring to here.		
220:05 - 220:06	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:06	AH_v11p.94
	220:05 Q. Mr. Hasbun, you've been handed a document 220:06 that we've marked as Exhibit 644. (edited)		
220:11 - 220:14	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:09	AH_v11p.95
	220:11 Q. And this is a document that was prepared 220:12 by your boss, Brooke Anderson, back on January 24th, 220:13 2018, right? 220:14 A. Yes.		
220:18 - 220:20	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:11	AH_v11p.96
	220:18 Q. And this is all surrounding the CNN sexual 220:19 assaults on Uber's reporting, right? 220:20 A. That's the title.		
222:04 - 222:12	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:25	AH_v11p.97
	222:04 What Ms. Anderson writes is, "Hi - Here is 222:05 the CNN piece about sexual assaults reported in 222:06 Ubers. It's a tough story. We expect this kind of 222:07 scrutiny to continue until as a business we address 222:08 some of the underlying challenges. Here are a few 222:09 issues driving negative attention from CNN as well 222:10 as other media and policymakers regularly." Did I 222:11 read that correctly? 222:12 A. Yes.		
223:20 - 224:03	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:24	AH_v11p.98
	223:20 This says -- the bullet point here, the 223:21 second bullet point, is "Transparency." You see		

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DESIGNATION	SOURCE	DURATION	ID
	223:22 that?		
	223:23 A. Yes.		
	223:24 Q. "We can't push back on CNN's (or any other		
	223:25 outlet's) numbers because 1) the real numbers that		
	224:01 we do track relative to this issue are actually much		
	224:02 higher (in the thousands)," correct?		
	224:03 A. That's what's written in the document.		
232:16 - 232:21	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:18	AH_v11p.99
	232:16 Q. Mr. Hasbun, we're going to change gears		
	232:17 here -- excuse me -- change gears here a little bit		
	232:18 and talk about your work with -- well, USA Today and		
	232:19 the Crawford Company back in 2019. Do you remember		
	232:20 that?		
	232:21 A. I do.		
234:05 - 234:22	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:54	AH_v11p.100
	234:05 This started back in the end of September		
	234:06 of 2019, correct?		
	234:07 A. I'd have to refresh my memory on the		
	234:08 dates, but...		
	234:09 Q. Does that sound about right?		
	234:10 A. It was around that time.		
	234:11 Q. And you had no idea that Uber did any work		
	234:12 with Crawford before hearing from a USA Today		
	234:13 reporter who was reporting the story, right?		
	234:14 A. Correct.		
	234:15 Q. All right. And you got a call from this		
	234:16 reporter, Tricia Nadolny, about Uber using Crawford,		
	234:17 who would go and make contact with sexual assault		
	234:18 victims and try to get settlements, right?		
	234:19 A. Correct.		
	234:20 Q. You had no idea that was happening before		
	234:21 you heard first from Ms. Nadolny, correct?		
	234:22 A. That's correct.		
237:05 - 237:13	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:28	AH_v11p.101
	237:05 Q. In that first conversation, you (edited)		
	237:06 realize there were some significant problems that		
	237:07 Uber was going to be facing because of what		
	237:08 Ms. Nadolny was reporting. One of those problems		
	237:09 was that Uber was giving -- was -- excuse me. The		
	237:10 first problem that was identified was that Uber		

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DESIGNATION	SOURCE	DURATION	ID
	237:11 wasn't telling victims of sexual assaults that Uber		
	237:12 was giving their information to some third party,		
	237:13 correct?		
237:17 - 238:03	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:26	AH_v11p.102
	237:17 A. I don't recall the specifics of our		
	237:18 discussion and whether she specifically told me		
	237:19 that, but generally, that is the crux of the story.		
	237:20 Q. You did find out --		
	237:21 A. Yes. Yeah.		
	237:22 Q. -- that in the course of her reporting at		
	237:23 some point, if not in the first conversation, then		
	237:24 certainly soon after, right?		
	237:25 A. Yes.		
	238:01 Q. Okay. That's one problem. The second		
	238:02 problem is that third party, Crawford, would then be		
	238:03 contacting them about their sexual assault, right?		
238:06 - 238:14	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:23	AH_v11p.103
	238:06 Q. That's another problem that you identified		
	238:07 that was brought to your attention by Ms. Nadolny,		
	238:08 right?		
	238:09 A. Yes, it was brought to my attention by the		
	238:10 reporter from USA Today.		
	238:11 Q. Another was that, according to Ms. Nadolny		
	238:12 and her reporting, that one of the victims was		
	238:13 actually visited by someone on behalf of Uber at her		
	238:14 house about her sexual assault, correct?		
238:18 - 238:22	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:11	AH_v11p.104
	238:18 A. That's one of the accusations, yes.		
	238:19 Q. And then the fourth big problem that was		
	238:20 identified was that Crawford was pushing sexual		
	238:21 assault victims who didn't have lawyers into		
	238:22 settling their cases against Uber, right?		
238:24 - 238:25	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:03	AH_v11p.105
	238:24 THE WITNESS: That's one of the		
	238:25 accusations that was conveyed to me.		
239:07 - 239:10	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:08	AH_v11p.106
	239:07 MR. MELUGIN: Let's go to Tab 56. This is		
	239:08 going to be Exhibit 2715.		
	239:09 (Whereupon Exhibit JCCP 2715/MDL 579 was		

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DESIGNATION	SOURCE	DURATION	ID
	239:10 marked for identification.)		
239:12 - 240:06	Hasbun, Andrew 2025-04-10 - WIT MP4	00:01:02	AH_v11p.107
	239:12 Q. Before we get into any questions, as of		
	239:13 this date, September 30th, 2019, when you were first		
	239:14 contacted by Ms. Nadolny with USA Today, Uber had		
	239:15 not published any statistics for sexual assaults or		
	239:16 other forms of sexual violence perpetrated in the		
	239:17 course of Uber rides, correct?		
	239:18 A. I'll have to double-check the date here.		
	239:19 Not that I'm aware of.		
	239:20 Q. That's correct, right? Because the first		
	239:21 Safety Report didn't come out for --		
	239:22 A. Two months after, I believe.		
	239:23 Q. Just a little bit more than two months		
	239:24 after, right. So you'd agree, as of this date, Uber		
	239:25 had not publicly disclosed any of its statistics		
	240:01 about the number of sexual assaults or other		
	240:02 instances of sexual violence that were perpetrated		
	240:03 through Uber, right?		
	240:04 A. As of this date, we had not published a		
	240:05 Safety Report, and we had, that I'm aware of,		
	240:06 published any additional data outside of that.		
240:07 - 240:13	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:27	AH_v11p.108
	240:07 Q. Okay. So I've hand -- you've been handed		
	240:08 2715. Is that right? Yeah, 2715, which is a series		
	240:09 of Slack messages between you and Ms. Kawada Page.		
	240:10 The first page has a Bates label ending 167, and		
	240:11 then continues consecutively through to 212.		
	240:12 Correct?		
	240:13 A. Yes.		
241:10 - 241:11	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:04	AH_v11p.109
	241:10 Q. All right. And I want to direct your		
	241:11 attention to the page ending 177. And what you		
241:12 - 242:02	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:52	AH_v11p.110
	241:12 write here on September 30th, 2019, on 177, is,		
	241:13 "Just got a call from USA Today." Do you see that?		
	241:14 A. Yes.		
	241:15 Q. It's actually highlighted for you. Jodi		
	241:16 responds and she says, "About what?"		

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	241:17 And then you wrote back to say		
	241:18 eventually -- y'all are missing each other's calls,		
	241:19 right?		
	241:20 A. Yes.		
	241:21 Q. And then she writes back to say -- or		
	241:22 excuse me. You write back to say, "A story on a		
	241:23 grand scale of bad," right?		
	241:24 A. Yes, that's what's in the chat.		
	241:25 Q. "Like really bad," is the next thing you		
	242:01 write, right?		
	242:02 A. Yes, that's what's in the chat.		
244:22 - 244:25	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:15	AH_v11p.111
	244:22 Q. And let's go back to Exhibit 2714. This		
	244:23 is the e-mail exhibit. You already have it in front		
	244:24 of you there.		
	244:25 A. I do. I have to dig a little bit. Okay.		
245:01 - 245:02	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:02	AH_v11p.112
	245:01 Q. Do you have it there?		
	245:02 A. I do.		
245:18 - 246:13	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:46	AH_v11p.113
	245:18 Q. You write her back.		
	245:19 A. Yes, I do.		
	245:20 Q. On October 1st, 2019, right?		
	245:21 A. Yes.		
	245:22 Q. And you said, "Sorry for the delay here."		
	245:23 Then you go on to say, "Crawford serves as a 3rd		
	245:24 party administrator for Uber's insurance program,"		
	245:25 right?		
	246:01 A. Yes.		
	246:02 Q. "It is common practice for companies to		
	246:03 utilize a 3rd party administrator, and Crawford's		
	246:04 role is to" -- what did you write after that?		
	246:05 A. "Help facilitate support for victims."		
	246:06 Q. All right. Told her that Crawford's role		
	246:07 is to help facilitate support for victims, right?		
	246:08 A. Yes.		
	246:09 Q. And then you go on to say, "We have long		
	246:10 believed that victims would feel more comfortable		
	246:11 working with a 3rd party rather than Uber directly."		
	246:12 Right?		

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DESIGNATION	SOURCE	DURATION	ID
	246:13 A. That's what's in there.		
246:19 - 247:11	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:42	AH_v11p.114
	246:19 Q. And Ms. Nadolny writes to you and says,		
	246:20 "The women we've spoken to said they were caught off		
	246:21 guard when contacted by a Crawford representative,		
	246:22 especially since they were never warned by Uber that		
	246:23 their information was being sent to an outside		
	246:24 company." Right? That's what she wrote back to		
	246:25 you, correct?		
	247:01 A. Correct.		
	247:02 Q. "They said the Crawford representative did		
	247:03 not offer them support, as your e-mail suggested,		
	247:04 but instead said the company was investigating their		
	247:05 case or handling the claims process," right?		
	247:06 A. Correct.		
	247:07 Q. "Some felt that Crawford, in attempting to		
	247:08 offer them a settlement, was looking to cover up		
	247:09 what had happened to them or to buy their silence."		
	247:10 Right?		
	247:11 A. That's what Tricia wrote.		
248:17 - 248:18	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:07	AH_v11p.115
	248:17 Q. 2715, the one with Ms. Kawada Page. And I		
	248:18 want to direct your attention to the one ending 179.		
248:19 - 248:20	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:02	AH_v11p.116
	248:19 Correct? You're on 179?		
	248:20 A. I'm on it.		
248:24 - 249:02	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:10	AH_v11p.117
	248:24 Q. What's the thing that -- the last full		
	248:25 message that you write there on Page 179 to		
	249:01 Ms. Kawada Page?		
	249:02 A. "You'll find me crying in the hallway."		
249:20 - 250:06	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:30	AH_v11p.118
	249:20 Q. All right. And then if you go to the		
	249:21 following page, you say, "I feel like I am being		
	249:22 misled by legal." You see that?		
	249:23 A. Yes.		
	249:24 Q. What's the next thing you write?		
	249:25 A. "'Support' and 'settlement' are two very		
	250:01 different things."		

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DESIGNATION	SOURCE	DURATION	ID
	250:02 Q. Right. And you knew that was correct, 250:03 right? Support and settlement are two very 250:04 different things? 250:05 A. By definition, they are very different 250:06 things.		
250:12 - 250:15	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:09	AH_v11p.119
	250:12 Q. All right. What we're going to do is, I'm 250:13 going to read the Jodi Page parts, and I'm going to 250:14 have you read your responses. Okay? 250:15 A. Mm-hmm.		
250:21 - 251:12	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:48	AH_v11p.120
	250:21 Q. So you wrote first -- start again with the 250:22 "Support and settlement are two very different 250:23 things." We're going to end with the one just 250:24 before "can't hear you," but I want you to start 250:25 with "Support and settlement are two very different 251:01 things." Go ahead. 251:02 A. "Support and settlement are two very 251:03 different things." 251:04 Q. Ms. Page responds to say, "Do you have a 251:05 comms doc?" 251:06 A. "I am working on it now. And I don't want 251:07 everyone's opinion on this. T thinks RAINN won't be 251:08 happy. Katie thinks we are doing god work." Not 251:09 sure what I meant there. Might be a typo. 251:10 Q. You think you meant "God's work"? 251:11 A. "Good work" or "God's work." I don't 251:12 know.		
252:15 - 252:22	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:15	AH_v11p.121
	252:15 Q. That's what next (edited) 252:16 thing that you said after "Katie thinks we are doing 252:17 god work"? 252:18 A. "USA Today thinks we are sleazy." 252:19 Q. And the next thing after that that you 252:20 wrote? 252:21 A. "The e-mail from USA Today is horrible and 252:22 we are fucked."		
262:04 - 262:05	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:08	AH_v11p.122
	262:04 Q. Let's go to Exhibit 2715 again. That is		

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DESIGNATION	SOURCE	DURATION	ID
	262:05 your chat with Ms. Page. And specifically, this is		
262:06 - 262:12	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:23	AH_v11p.123
	262:06 all -- is this before the publication of the article		
	262:07 in USA Today, or after? It's all within the same		
	262:08 few days, right?		
	262:09 A. I have to go back and double-check the		
	262:10 dates. They're all --		
	262:11 Q. All right.		
	262:12 A. -- conflating.		
262:18 - 265:22	Hasbun, Andrew 2025-04-10 - PIP MP4	00:03:04	AH_v11p.124
	262:18 Q. And this is Jodi Page, your coworker, not		
	262:19 a lawyer, right?		
	262:20 A. Correct.		
	262:21 Q. And she says, "You've mounted an		
	262:22 incredible defense and Katie should be grateful,"		
	262:23 right?		
	262:24 A. I need a second to find this.		
	262:25 Q. It's at the bottom quarter of the page.		
	263:01 A. Yes, I see it.		
	263:02 Q. And then what's the next thing she writes?		
	263:03 A. She writes, "This is far from doing the		
	263:04 right thing - no matter how they want to spin to		
	263:05 themselves."		
	263:06 Q. And that would be a reference to "Do the		
	263:07 right thing. Period," right?		
	263:08 A. I can't speak for Jodi and what she's		
	263:09 referencing.		
	263:10 Q. You didn't understand her to be		
	263:11 referencing Uber's motto for "Do the right thing.		
	263:12 Period," there, when she says, "This is far from		
	263:13 doing the right thing"?		
	263:14 A. I don't know what Jodi's referencing.		
	263:15 Q. Okay.		
	263:16 A. I can only reference what's on the page.		
	263:17 Q. Well, you wrote back and said, "Right,"		
	263:18 question mark, question mark, question mark. "She		
	263:19 owes me."		
	263:20 A. Yes, that's what's in the chat.		
	263:21 Q. And then she said, "She'll never think she		
	263:22 owes you."		

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DESIGNATION	SOURCE	DURATION	ID
263:23	And you said, "I know. That's the		
263:24	problem."		
263:25	A. Yes, that's in the chat.		
264:01	Q. And then you go on to say in this same		
264:02	chat, a few lines down, all within a couple of		
264:03	minutes, "By the way, Binnings is in Maldives for		
264:04	two weeks." That's Scott Binnings, right?		
264:05	A. I believe she is referring to Scott		
264:06	Binnings, who is in-house counsel.		
264:07	Q. That's you referring --		
264:08	A. Oh, me? Yes.		
264:09	Q. Right?		
264:10	A. Another typo.		
264:11	Q. "By the way, Binnings is in Maldives for		
264:12	two weeks." That's what you wrote, right?		
264:13	A. Yes.		
264:14	Q. And then you wrote, "Yup."		
264:15	And then Jodi wrote what?		
264:16	A. "Good for him."		
264:17	Q. And then going on to the next page here,		
264:18	the page ending 8200 in Exhibit 2715, Jodi writes,		
264:19	"He makes sure to take" -- "he makes sure to take		
264:20	his vacas," right?		
264:21	A. Yes.		
264:22	Q. And then what did you write next?		
264:23	A. "While rest us are peddling lies and		
264:24	cleaning up their mess."		
264:25	Q. Yeah, and what you meant was, "While the		
265:01	rest of us are peddling lies and cleaning up their		
265:02	mess," right?		
265:03	A. There are words left out here, so...		
265:04	Q. "The" and "of" are the only two words left		
265:05	out of what I just said, right?		
265:06	A. Correct.		
265:07	Q. And so how -- how you meant it when you		
265:08	wrote it was, "While the rest of us are peddling		
265:09	lies and cleaning up their mess," right?		
265:10	A. I don't recall what I meant when I wrote		
265:11	it. What's on the paper is, "While rest of us are		
265:12	peddling lies and cleaning up their mess."		
265:13	Q. And then you wrote, "Gus has been oddly		

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DESIGNATION	SOURCE	DURATION	ID
	265:14 quiet on this. I think cause he knows how bad it		
	265:15 looks." Right?		
	265:16 A. Correct. That's what's on the paper.		
	265:17 Q. And then if you go on down, Jodi says, "D		
	265:18 is not going to be happy. T seems silent as well -		
	265:19 no?" Is "D" there Dara?		
	265:20 A. I don't know.		
	265:21 Q. "T" is Tracey, right?		
	265:22 A. I can only assume.		
268:09 - 268:19	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:32	AH_v11p.125
	268:09 You write, "Gus has been oddly quiet on		
	268:10 this. I think he knows how bad it looks." That's		
	268:11 Gus Fuldner, correct?		
	268:12 A. Yes, I believe so.		
	268:13 Q. And then USA Today ultimately publishes		
	268:14 the article after this conversation, right? Because		
	268:15 then you put the link, a few hours later, in this		
	268:16 same chat up to Ms. Page, right? Do you see on		
	268:17 the --		
	268:18 A. Yes, I see that.		
	268:19 Q. -- next page here?		
269:25 - 270:03	Hasbun, Andrew 2025-04-10 - WIT MP4	00:00:02	AH_v11p.126
	269:25 MR. MELUGIN: Let's go now to		
	270:01 Exhibit 2220.		
	270:02 (Whereupon Exhibit JCCP 2220/MDL 2220 was		
	270:03 marked for identification.)		
270:04 - 270:12	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:33	AH_v11p.127
	270:04 BY MR. MELUGIN:		
	270:05 Q. Mr. Hasbun, you've been handed an exhibit		
	270:06 that's been marked as Exhibit 2220. It is another		
	270:07 chat between you and Ms. Page that covers a few days		
	270:08 a few weeks after the USA Today article. The		
	270:09 earliest message in the chat is November 18th, 2019,		
	270:10 and it goes on through to November 23rd, 2019. Did		
	270:11 I correctly identify Exhibit 2220 for you?		
	270:12 A. Yes.		
271:04 - 271:18	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:36	AH_v11p.128
	271:04 Q. And I want to direct your attention to the		
	271:05 message that you sent. It's about two-thirds of the		

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DESIGNATION	SOURCE	DURATION	ID
	271:06 way down the page, where you write, "How's B"?		
	271:07 A. Yes, I see it.		
	271:08 Q. That's Brooke Anderson you're referring		
	271:09 to, right?		
	271:10 A. It's been a while. I believe so.		
	271:11 Q. Sorry?		
	271:12 A. This has been a while, but I believe so.		
	271:13 Q. And then you go on to say, "She dead		
	271:14 inside yet?"		
	271:15 A. Correct. That's in there. Says that.		
	271:16 Q. Jodi responds back to you and says,		
	271:17 "Crazy," right?		
	271:18 A. Yes.		
271:23 - 272:01	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:10	AH_v11p.129
	271:23 Q. And this is about, what, 12 days or so		
	271:24 before Uber has published its first US Safety		
	271:25 Report, correct?		
	272:01 A. Correct.		
272:10 - 272:15	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:10	AH_v11p.130
	272:10 Q. But what you do say there is, "I've got a		
	272:11 bad feeling about the categories," right?		
	272:12 A. Yes, I do.		
	272:13 Q. And that's in relation to the taxonomy		
	272:14 categories, right?		
	272:15 A. Yes.		
274:05 - 274:12	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:16	AH_v11p.131
	274:05 Q. You go on down and say, "Like what is		
	274:06 non-consensual penetration?" That's one of the		
	274:07 categories, right?		
	274:08 A. Yes. As I explained, that is what my		
	274:09 concern was here.		
	274:10 Q. Yeah.		
	274:11 A. Is that a term like "non-consensual sexual		
	274:12 penetration" is a very technical term.		
275:05 - 276:15	Hasbun, Andrew 2025-04-10 - PIP MP4	00:01:31	AH_v11p.132
	275:05 Q. Now, Jodi is also talking about how funny		
	275:06 things are with Brooke, right? That was in the		
	275:07 context of the same conversation. She says, "Crazy.		
	275:08 But funny."		

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DESIGNATION	SOURCE	DURATION	ID
	275:09 A. Appears -- appears that's what Jodi is		
	275:10 referencing, yeah.		
	275:11 Q. She says, "Like we were cracking up		
	275:12 laughing at you," right? Do you see that on		
	275:13 Page 569?		
	275:14 A. Yes, I see it.		
	275:15 Q. And then a little further down, you write,		
	275:16 "Why? Because I don't give a shit anymore and just		
	275:17 want to rage?" Right?		
	275:18 A. That's what's written in the doc.		
	275:19 Q. And then Jodi responds to say, "Because		
	275:20 she said that you have all kinds of opinions about		
	275:21 Gus," right?		
	275:22 A. Yes.		
	275:23 Q. And again, that's Gus Fuldner, right?		
	275:24 A. It is. I believe so.		
	275:25 Q. It is, is what you said.		
	276:01 A. Yeah, but Jodi wrote this, so --		
	276:02 Q. I just couldn't hear you. The "Gus" that		
	276:03 is referred to there is Gus Fuldner, correct?		
	276:04 A. I'm assuming Jodi is referring to Gus,		
	276:05 yes.		
	276:06 Q. Because you had all kinds of opinions		
	276:07 about Gus Fuldner, right?		
	276:08 A. Over the years I've had opinions about		
	276:09 Gus, yes.		
	276:10 Q. And you wrote, "I do," in response to		
	276:11 Ms. Page's statement there, correct?		
	276:12 A. Correct.		
	276:13 Q. And then Jodi goes on to say, "And I said		
	276:14 it's because Andrew thinks he sold his soul," right?		
	276:15 A. That's what's in the doc.		
278:02 - 279:01	Hasbun, Andrew 2025-04-10 - PIP MP4	00:01:16	AH_v11p.133
	278:02 Q. After that, you say, "I don't think, I		
	278:03 did." That goes to the next page, the page ending		
	278:04 570 here in Exhibit 2220, right?		
	278:05 A. Sorry. I have to pull the document more.		
	278:06 Yes, I see it.		
	278:07 Q. That's what you wrote, "I don't think, I		
	278:08 did."		

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DESIGNATION	SOURCE	DURATION	ID
	278:09 A. Yes, that's what I wrote.		
	278:10 Q. And that is a reference back to		
	278:11 Mrs. Page's comment that "Andrew," you, "thinks he		
	278:12 sold his soul," right?		
	278:13 A. Yes, I believe that that's a reference		
	278:14 back to that.		
	278:15 Q. Yeah. You responded to her to say, "I		
	278:16 don't think I sold my soul. I did." Right?		
	278:17 A. That's what's in the document.		
	278:18 Q. And then the next thing that you write is,		
	278:19 "I trashed rape victims to USA Today," right?		
	278:20 A. Yes, that's what's written.		
	278:21 Q. And that's a reference back to your work		
	278:22 on the Crawford story, correct?		
	278:23 A. Yeah, the work on the Crawford story		
	278:24 included correcting facts and working with reporters		
	278:25 to convey what happened to the women involved in the		
	279:01 story.		
279:10 - 279:13	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:07	AH_v11p.134
	279:10 Q. You wrote that you trashed rape victims to		
	279:11 USA Today, correct?		
	279:12 A. I understand what's in here. The word		
	279:13 choice is poor.		
279:19 - 279:24	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:16	AH_v11p.135
	279:19 Q. And then you said, "Out of 3, I trashed		
	279:20 2," correct?		
	279:21 A. What I'm referring to here is correcting		
	279:22 facts in their story. I used a poor choice of		
	279:23 words.		
	279:24 Q. You trashed them, according to you, right?		
280:01 - 280:02	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:03	AH_v11p.136
	280:01 THE WITNESS: This is how I characterize		
	280:02 things in a poor choice of words. I do not believe		
280:03 - 280:04	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:03	AH_v11p.137
	280:03 that I trashed the victims in speaking with USA		
	280:04 Today.		
280:21 - 280:22	Hasbun, Andrew 2025-04-10 - PIP MP4	00:00:04	AH_v11p.138
	280:21 Q. And then you wrote, "I sliced their		
	280:22 credibility," right?		

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DESIGNATION	SOURCE	DURATION	ID
280:24 - 281:08	Hasbun, Andrew 2025-04-10 - PIP MP4 280:24 THE WITNESS: That's what's in the 280:25 document. 281:01 BY MR. MELUGIN: 281:02 Q. You wrote, "Sliced their credibility," 281:03 right? 281:04 A. (Nods head.) 281:05 Q. He objected. I'm correcting the 281:06 objection. You wrote, "Sliced their credibility," 281:07 correct? 281:08 A. That's what's in the document.	00:00:13	AH_v11p.139
282:02 - 282:05	Hasbun, Andrew 2025-04-10 - WIT MP4 282:02 Mr. Hasbun, the next thing Ms. Page writes 282:03 is, "Hi, I'm Andrew Hasbun, and I look after," dot 282:04 dot dot, right? 282:05 A. Yes.	00:00:12	AH_v11p.140
282:06 - 282:15	Hasbun, Andrew 2025-04-10 - WIT MP4 282:06 Q. And then you wrote, "Hi, I'm Andrew 282:07 Hasbun, and I look after Gus and Katie lies," right? 282:08 A. That's what's written in the document. 282:09 Q. That's Gus Fuldner and Katie Waitzman, 282:10 right? 282:11 A. Katie Waitzman, our in-house counsel. 282:12 Q. Right. And then you say, "I used to look 282:13 after my soul but I don't know where it is anymore," 282:14 right? 282:15 A. Correct.	00:00:30	AH_v11p.141
283:11 - 283:21	Hasbun, Andrew 2025-04-10 - WIT MP4 283:11 Gus Fuldner's (edited) 283:12 job at this point includes looking out for women's 283:13 safety, right? 283:14 A. I'd have to look at the org chart. I 283:15 think they all rolled up into Gus, yes. 283:16 Q. Yeah. Safety & Insurance, that's his 283:17 department, right? Correct? 283:18 A. Correct. 283:19 Q. And he's making decisions that affect 283:20 women's safety, right? 283:21 A. Yes.	00:00:26	AH_v11p.142

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284:11 - 284:12	Hasbun, Andrew 2025-04-10 - WIT MP4 284:11 Q. He's on ELT today, right? 284:12 A. He is.	00:00:02	AH_v11p.143
325:02 - 325:05	Hasbun, Andrew 2025-04-11 - PIP MP4 325:02 MR. SMITH: Tab E. This is going to be 325:03 Exhibit 536. 325:04 (Whereupon Exhibit MDL 536/JCCP 2722 was 325:05 marked for identification.)	00:00:07	AH_v11p.144
326:14 - 327:09	Hasbun, Andrew 2025-04-11 - PIP MP4 326:14 Q. So this is a PowerPoint presentation that 326:15 we're looking at, right? 326:16 A. We use Google Slides. Very similar. But 326:17 like I said, there's some -- there are times when 326:18 people do slides and it's not necessarily for a 326:19 presentation. It's just because it's prettier. 326:20 Q. Okay. And then do you see where it says 326:21 "All Custodians"? It says, "Danielle" -- 326:22 A. Yes. 326:23 Q. -- "Danielle Sheridan"? 326:24 A. Yes, I see it. 326:25 Q. Do you know Danielle Sheridan? 327:01 A. I do. 327:02 Q. Who is Danielle Sheridan? 327:03 A. I'm trying to think what her title was at 327:04 the time. I honestly don't remember. She was at 327:05 Uber. She left a few years ago, and she -- 327:06 Q. Sorry. 327:07 A. I believe she was the head of safety 327:08 operations back then, although I don't -- I really 327:09 don't remember her official title.	00:00:53	AH_v11p.145
327:14 - 327:24	Hasbun, Andrew 2025-04-11 - PIP MP4 327:14 Q. And do you see that says, "Date Created: 327:15 June 2nd, 2017" here? 327:16 A. Yes, I see it. 327:17 Q. If we look back at the first page of the 327:18 actual documents, so I guess the second page of this 327:19 PDF, it says, "US & CAN." Do you understand that to 327:20 be Canada? 327:21 A. Yes. 327:22 Q. Okay. "US & Canada Business Standards,"	00:00:26	AH_v11p.146

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	327:23 right?		
	327:24 A. Yes.		
334:13 - 334:17	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:14	AH_v11p.147
	334:13 Q. Okay. And it says "Sexual Misconduct" up		
	334:14 here at the top. And then it says, "Rider or driver		
	334:15 reports inappropriate remarks, explicit behavior, or		
	334:16 indecent exposure." Do you see that?		
	334:17 A. Yes.		
335:23 - 337:11	Hasbun, Andrew 2025-04-11 - PIP MP4	00:01:40	AH_v11p.148
	335:23 Q. Let's look at the table that's to the		
	335:24 left, this one that has these two columns. One says		
	335:25 "Current Standard" and one says "Pain Points." Do		
	336:01 you see that?		
	336:02 A. I see it.		
	336:03 Q. And in the current standard -- let's look		
	336:04 at the current standard part first. It says, "There		
	336:05 are 4 categories within sexual misconduct and		
	336:06 strikes are siloed within each category." You see		
	336:07 that?		
	336:08 A. I see it.		
	336:09 Q. Do you know what it means for a strike to		
	336:10 be siloed in a category?		
	336:11 A. I don't know what they're referring to		
	336:12 here. I don't know what that means.		
	336:13 Q. Never heard that term at all in your work		
	336:14 as a director of safety communications for Uber?		
	336:15 A. I've definitely heard the term "siloed"		
	336:16 many times, but in this context I don't really know		
	336:17 what they're referring to.		
	336:18 Q. "Pain Points," you see that column?		
	336:19 A. Yes.		
	336:20 Q. Maybe this will answer the question or		
	336:21 give us some insight. It says, "No coordination		
	336:22 between categories - can get a strike in each		
	336:23 without deactivation," right? Do you see that?		
	336:24 A. I see it.		
	336:25 Q. And then it says, "373 active US & Canada		
	337:01 drivers have 3 or more strikes for sexual		
	337:02 misconduct." Do you see that?		
	337:03 A. I see it.		

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DESIGNATION	SOURCE	DURATION	ID
	337:04 Q. Okay. And this is -- this says "drivers,"		
	337:05 not "partners," right?		
	337:06 A. That's what's written in the document,		
	337:07 yes.		
	337:08 Q. Okay. And it's saying there are 373		
	337:09 active drivers who have three or more strikes for		
	337:10 sexual misconduct, right?		
	337:11 A. That's what's written in the doc, yes.		
337:19 - 337:25	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:14	AH_v11p.149
	337:19 Q. But you had never seen this stuff before,		
	337:20 right?		
	337:21 A. I have never seen this document, no.		
	337:22 Q. And no one ever shared it with you,		
	337:23 saying, "Hey, Mr. Hasbun, you're the safety		
	337:24 communications director. You might want to know		
	337:25 this information"?		
338:02 - 338:07	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:13	AH_v11p.150
	338:02 THE WITNESS: This document's from 2017.		
	338:03 I was not the safety communications director then.		
	338:04 BY MR. SMITH:		
	338:05 Q. You were a communications manager, right?		
	338:06 A. Correct. I was on a team that managed		
	338:07 media relations.		
463:09 - 463:23	Hasbun, Andrew 2025-04-11	00:00:43	AH_v11p.151
	463:09 Q. Mr. Hasbun, what's women rider preferred?		
	463:10 A. Women rider preferred is a tech feature		
	463:11 that we developed so that women drivers can set a		
	463:12 preference to have only women and non-binary riders		
	463:13 as their passengers.		
	463:14 It's a feature we launched first in Saudi		
	463:15 Arabia. I don't recall the date off the top of my		
	463:16 head, because women had just received the right to		
	463:17 drive in Saudi Arabia, and it's a feature that's		
	463:18 available in a handful of countries around the		
	463:19 world. I don't know the number off the top of my		
	463:20 head.		
	463:21 Q. It's a feature that's not available in the		
	463:22 United States; is that true?		
	463:23 A. That's correct.		

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DESIGNATION	SOURCE	DURATION	ID
464:06 - 464:09	Hasbun, Andrew 2025-04-11 - PIP MP4 464:06 Q. In the United States, Uber does not allow 464:07 women riders to indicate a preference to be matched 464:08 with another woman driver? 464:09 A. No, we don't.	00:00:11	AH_v11p.152
464:20 - 466:13	Hasbun, Andrew 2025-04-11 - PIP MP4 464:20 Q. Okay. So there's women preferred -- women 464:21 rider preferred, right? 464:22 A. Correct. That's for a woman driver to 464:23 select a preference for a woman rider. 464:24 Q. And is there women driver preferred? 464:25 A. There are versions of that in some other 465:01 countries, yes. 465:02 Q. Are there versions of that from other 465:03 companies in the United States? 465:04 A. Yes, there are. Lyft has a feature that 465:05 is similar, but less restrictive than ours. 465:06 Q. What is -- when you say "less restrictive 465:07 than ours," what do you mean? 465:08 A. Lyft allows woman riders and drivers to 465:09 set a preference for a female rider or driver, but 465:10 it's just a preference. It's not only. And that's 465:11 the main distinction between the two products that 465:12 are available. Ours is more restrictive, where it's 465:13 not a preference. It's you want only women and 465:14 non-binary riders. 465:15 Q. Lyft allows that -- I'm sorry, I didn't 465:16 mean to cut you off. 465:17 A. But -- that's okay. It was -- go ahead. 465:18 Q. Lyft has that feature of selecting a 465:19 preference of a woman rider or driver here in the 465:20 United States, right? 465:21 A. Correct. It is a preference, not a 465:22 guarantee. 465:23 Q. Uber does not have a preference or a 465:24 guarantee in the United States of a woman driver or 465:25 woman rider, right? 466:01 A. Correct. 466:02 Q. So when you say it's less restrictive, 466:03 that doesn't apply to the United States, right?	00:01:56	AH_v11p.153

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DESIGNATION	SOURCE	DURATION	ID
	466:04 A. No, I'm not referring to the U.S. It's		
	466:05 just looking at the products, regardless of where		
	466:06 they're available, those are, that's the difference.		
	466:07 Q. Would you agree that Uber considered a		
	466:08 women rider preferred and women driver preferred in		
	466:09 the United States?		
	466:10 A. Yes, it's been a discussion.		
	466:11 Q. And it has chosen, at least up until		
	466:12 today, to not implement that feature, right?		
	466:13 A. Yes.		
473:13 - 473:16	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:05	AH_v11p.154
	473:13 MR. SMITH: Let's look at Tab 4. This		
	473:14 will be Exhibit 547.		
	473:15 (Whereupon Exhibit MDL 547/JCCP 538 was		
	473:16 marked for identification.)		
473:25 - 474:17	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:34	AH_v11p.155
	473:25 Q. All right. This is a chat dated		
	474:01 February 25th, 2020. See that?		
	474:02 A. Yes.		
	474:03 Q. How many years do you think you've been		
	474:04 advocating for women rider preferred and women		
	474:05 driver preferred at Uber in the United States?		
	474:06 A. Well, if we go back to this time, at least		
	474:07 five.		
	474:08 Q. At least five. Any more than that, do you		
	474:09 think?		
	474:10 A. I can't remember when the discussion		
	474:11 started. It was probably shortly after we launched		
	474:12 in Saudi Arabia.		
	474:13 Q. This is about a month after that last chat		
	474:14 we looked at that was in January.		
	474:15 A. Mm-hmm.		
	474:16 Q. Right?		
	474:17 A. Yes.		
475:03 - 475:07	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:13	AH_v11p.156
	475:03 Q. And then he asks you, "Are we aligned on		
	475:04 products for the event? Ridesense, women rider		
	475:05 preferred, audio recording, mandatory sexual assault		
	475:06 education for all US drivers." Do you see that?		
	475:07 A. I see it.		

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DESIGNATION	SOURCE	DURATION	ID
475:12 - 475:17	<p>Hasbun, Andrew 2025-04-11 - PIP MP4</p> <p>475:12 Q. And you say, "You and me are. You me 475:13 Brooke are," right? You see that? 475:14 A. Yes, I see it. 475:15 Q. You say, "Sachin and Gus might be a 475:16 different story." Right? 475:17 A. Yes, I see that.</p>	00:00:14	AH_v11p.157
475:20 - 476:07	<p>Hasbun, Andrew 2025-04-11 - PIP MP4</p> <p>475:20 Q. Who's Sachin? (edited) 475:21 A. Sachin is currently our head of product. 475:22 He is our chief product officer. At this time he 475:23 was the head of safety product. 475:24 Q. And "Gus" is Gus Fuldner again, right? 475:25 A. Yes. 476:01 Q. And you say, "But Gus is on board, I" -- 476:02 or you -- excuse me. Strike that. You say, "But 476:03 Sachin" -- "Sachin is on board, I know that." 476:04 A. Yes. 476:05 Q. Right? 476:06 And then if you go down to your next 476:07 message, can you read what you wrote?</p>	00:00:40	AH_v11p.158
476:08 - 476:23	<p>Hasbun, Andrew 2025-04-11 - PIP MP4</p> <p>476:08 A. Are you ready? Want me to read it now? 476:09 Q. Yeah. Could you read it to the jury? I'm 476:10 sorry. Let's read it aloud. 476:11 A. I wrote, "Gus was kind of a pussy about 476:12 women driving women but I don't think he is going to 476:13 win this one." 476:14 Q. What did you mean when you said "Gus was 476:15 kind of a pussy about women driving women"? 476:16 A. I do -- I don't recall what was happening 476:17 at this time, so I don't know what I'm specifically 476:18 referring to. This was -- if we look at the date 476:19 here, this was February 25th, 2020. This was as 476:20 COVID was raining down, and my role was extremely 476:21 busy. So a lot of things during this time frame are 476:22 a bit of a blur. So I truly cannot recall the 476:23 specific reason why I used that inappropriate term.</p>	00:00:59	AH_v11p.159
478:09 - 478:12	<p>Hasbun, Andrew 2025-04-11 - PIP MP4</p>	00:00:14	AH_v11p.160

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DESIGNATION	SOURCE	DURATION	ID
	478:09 Q. You're saying Gus is being kind of afraid 478:10 about Women Driving Women. He doesn't want to take 478:11 the risk on it, right? 478:12 A. That can be inferred, absolutely.		AH_v11p.160
478:19 - 478:22	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:07	AH_v11p.161
	478:19 Q. "The tide is (edited) 478:20 too strong. Everyone wants it. Worth the risk," 478:21 right? 478:22 A. That's what's written.		
478:23 - 478:24	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:05	AH_v11p.162
	478:23 Q. What was the risk of women rider preferred 478:24 and women driver preferred?		
479:16 - 479:24	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:29	AH_v11p.163
	479:16 there were legal risks presented to all of us 479:17 involved in these discussions, including various 479:18 decision makers, including Gus, and they had to 479:19 weigh that risk, and some of us felt the risk was 479:20 worth it, and others -- at this moment in time in 479:21 the company, as I mentioned, COVID was brewing down. 479:22 There were lots of things happening. Evaluated all 479:23 the risks, looked at it, and felt that it wasn't the 479:24 right time.		
493:06 - 493:07	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:02	AH_v11p.164
	493:06 Q. And Uber doesn't just have one sexual 493:07 assault, right?		
493:09 - 493:15	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:14	AH_v11p.165
	493:09 THE WITNESS: No, we do not. Our Safety 493:10 Report clearly shows that there's more than one, and 493:11 all of them are bad. 493:12 BY MR. SMITH: 493:13 Q. Oh, I'm sorry. 493:14 A. Our Safety Report shows the numbers, and 493:15 all of them are bad. There's no question about it.		
507:24 - 508:02	Hasbun, Andrew 2025-04-11	00:00:05	AH_v11p.166
	507:24 let's go to Tab I. It's going to be (edited) 507:25 Exhibit 551. 508:01 (Whereupon Exhibit MDL 551/JCCP 2734 was 508:02 marked for identification.)		

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DESIGNATION	SOURCE	DURATION	ID
508:12 - 508:24	<p>Hasbun, Andrew 2025-04-11 - PIP MP4</p> <p>508:12 Q. If we go to the second page, see the 508:13 actual chat. This is a Slack between you and Emilie 508:14 Boman, right? 508:15 A. Yes, it is. 508:16 Q. Who's Emilie Boman? 508:17 A. Emilie Boman is our head of safety policy. 508:18 She handles a number of other things too, but one of 508:19 her roles is safety policy. 508:20 Q. This chat is dated 2021 -- well, 508:21 April 6th, 2021, right? 508:22 A. Yes. 508:23 Q. About four years ago, right? 508:24 A. Yes.</p>	00:00:40	AH_v11p.167
508:25 - 509:08	<p>Hasbun, Andrew 2025-04-11 - PIP MP4</p> <p>508:25 Q. If you go to the page that ends in 8245 -- 509:01 I think this is the page we're on -- there's a 509:02 message around the middle of the page or so from 509:03 Emilie Boman, says, "Hey." You see that? 509:04 A. Yes. 509:05 Q. She says, "Hey. I'm debriefing with 509:06 Brittany on ELT discussion. Added you as optional 509:07 if you want to join." Do you see that? 509:08 A. I see it.</p>	00:00:22	AH_v11p.168
509:14 - 509:19	<p>Hasbun, Andrew 2025-04-11 - PIP MP4</p> <p>509:14 Q. "ELT decision" is -- or discussion -- 509:15 sorry -- is the executive leadership team, right? 509:16 A. Yes. 509:17 Q. They're having some sort of discussion, 509:18 right? 509:19 A. Yes.</p>	00:00:14	AH_v11p.169
510:03 - 510:25	<p>Hasbun, Andrew 2025-04-11 - PIP MP4</p> <p>510:03 Q. So she asks if you want to join this 510:04 discussion with her and Brittany Anthony, right? 510:05 A. Yes. 510:06 Q. You say, "yes." You do want to join their 510:07 discussion, right? 510:08 A. I do. 510:09 Q. If you scroll down to the next page, you 510:10 have a message at 19:43:54. You say, "So it is..."</p>	00:01:15	AH_v11p.170

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DESIGNATION	SOURCE	DURATION	ID
	510:11 Let Australia go, see what happens, maybe US later."		
	510:12 Right?		
	510:13 A. Correct.		
	510:14 Q. Emilie says, "Yep. Look at safety impact,		
	510:15 and supply impact. Do proper marketing around it to		
	510:16 attract women drivers." See that?		
	510:17 A. Yes.		
	510:18 Q. "And then revisit trade-off in US....		
	510:19 supply impact vs legal cost," right?		
	510:20 A. Yes, that's what's in the document.		
	510:21 Q. Does this help you -- does this orient you		
	510:22 to the fact that you were discussing women rider and		
	510:23 women driver preferred in this DM with Emilie Boman?		
	510:24 A. Yes, it is. It does. That is what we're		
	510:25 referring to.		
511:01 - 511:17	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:48	AH_v11p.171
	511:01 Q. And then you say, "I can't believe they		
	511:02 actually believed the legal costs," right?		
	511:03 A. Yes, that's what's in there.		
	511:04 Q. You say, "So can we just make up numbers		
	511:05 too based on something totally off base? We should		
	511:06 get in the habit of doing that to get our way. 'If		
	511:07 we do this, we will have 150 negative stories based		
	511:08 off the news of Travis dancing in the back of the		
	511:09 car.'" Do you see that?		
	511:10 A. Yes, I do.		
	511:11 Q. Emilie says, "Yeah, I think the \$ amount		
	511:12 hit Dara, Nelson and Mac hard. And Jill/Gus were		
	511:13 pretty silent on it." See that?		
	511:14 A. Yes, I see it.		
	511:15 Q. Those are members of the executive		
	511:16 leadership team, right?		
	511:17 A. Yes.		
512:04 - 512:14	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:35	AH_v11p.172
	512:04 Q. You say, "Well, it will come back to bite		
	512:05 us. And I certainly won't be there to help cover		
	512:06 for our bad decisions." You see that?		
	512:07 A. Yes, I see it.		
	512:08 Q. And the bad decision you're talking about		
	512:09 here is not doing women rider or women driver		

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DESIGNATION	SOURCE	DURATION	ID
	512:10 preferred, right?		
	512:11 A. Clearly I disagree with the decision.		
	512:12 Q. You think it's going to come back to bite		
	512:13 Uber, right?		
	512:14 A. That's what's written in the document.		
512:15 - 512:17	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:08	AH_v11p.173
	512:15 Q. And you think Uber was wrong to not		
	512:16 implement women driver preferred/women rider		
	512:17 preferred?		
512:19 - 512:23	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:14	AH_v11p.174
	512:19 THE WITNESS: I don't think it's fair to		
	512:20 characterize it as a right or wrong decision. You		
	512:21 can -- you can disagree with the decision and not		
	512:22 necessarily pass judgment on whether it's right or		
	512:23 wrong. I would have made a different decision.		
515:14 - 515:14	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:01	AH_v11p.175
	515:14 MR. SMITH: We can take that document		
515:15 - 515:16	Hasbun, Andrew 2025-04-11	00:00:04	AH_v11p.176
	515:15 Let's look at Tab 31. It's going to be 552. (edited)		
	515:16 Exhibit 52 (edited)		
516:02 - 516:08	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:25	AH_v11p.177
	516:02 Q. 552 is an e-mail from Natasha Weaser. Do		
	516:03 you see that?		
	516:04 A. I do.		
	516:05 Q. And you're bcc'd on this e-mail, right?		
	516:06 A. I believe so.		
	516:07 Q. Subject is "Launch WRP in Canada," right?		
	516:08 A. Yes.		
516:14 - 517:02	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:40	AH_v11p.178
	516:14 Q. Canada's got women rider preference today,		
	516:15 right?		
	516:16 A. Yes.		
	516:17 Q. They've had it since 2023, March 23rd,		
	516:18 right?		
	516:19 A. Correct.		
	516:20 Q. United States does not have women rider		
	516:21 preference, right?		
	516:22 A. Correct.		
	516:23 Q. And it says, "To date" -- excuse me.		

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DESIGNATION	SOURCE	DURATION	ID
	516:24 Says, "To date WRP is: Live in 23 countries, 516:25 Completed over 43 million trips, 16% of women driver 517:01 trips are on WRP." You see that? 517:02 A. Yes.		
557:04 - 557:21	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:55	AH_v11p.179
	557:04 Q. You mentioned the importance of safety as 557:05 a, I think, goal and mission at Uber. Can you tell 557:06 me more about that? 557:07 A. Absolutely. Safety is a core value at the 557:08 company. It's something that we have been investing 557:09 in since my time at Uber. And I'm really proud of 557:10 the work that we've done. I mean, we have to think 557:11 back that this ridesharing and this space didn't 557:12 exist ten years ago, 15 years ago. 557:13 And where we're at today compared to where 557:14 we were back in the 2010s, it's a completely 557:15 different experience. And a lot of that is based 557:16 off the investment and the work that's gone into 557:17 helping make the platform safer. The features, the 557:18 investments, the policies, that all represents years 557:19 of work by hundreds of people, the significant 557:20 investment around the world to build something that 557:21 has never been built before.		
559:09 - 559:23	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:54	AH_v11p.180
	559:09 Q. Can you tell me how the company has 559:10 changed during your tenure at Uber? 559:11 A. Yes. When I started in 2016, Travis 559:12 Kalanick was still the CEO. It was still a very 559:13 enjoyable place to work, but a very different 559:14 company. Dara Khosrowshahi took over around mid 559:15 2017, and one of the first things he did was sort of 559:16 reinvest in safety and double down on the customer 559:17 experience. 559:18 From that time moving forward, as I 559:19 mentioned before, we hired and staffed up a major 559:20 safety product team. We built safety features that 559:21 are now standard in the industry today, and much of 559:22 that is due to Dara's leadership and investment and 559:23 prioritizations back when he started in 2017.		
562:13 - 563:20	Hasbun, Andrew 2025-04-11 - PIP MP4	00:01:48	AH_v11p.181

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DESIGNATION	SOURCE	DURATION	ID
	562:13 Q. And you mentioned a bit about your 562:14 experiences over time at Uber. And give you a 562:15 moment to talk more about describing what is the 562:16 culture at Uber? 562:17 A. The culture at Uber is, I would say, very 562:18 collaborative and very process-oriented, but in a 562:19 very positive way. We -- there are no ideas that I 562:20 feel like at Uber are tossed aside or neglected or 562:21 ignored. It's probably one of the most intelligent 562:22 workplaces that I've been exposed to. 562:23 Certainly compared to my days in 562:24 television, the folks at Uber are extremely smart, 562:25 extreme -- they care deeply about the customers and 563:01 providing the best possible service. And what has 563:02 impressed me the most is that when it comes time to 563:03 fix a problem, everyone runs in the same direction. 563:04 Q. So just piggybacking off of your answer 563:05 here, how would you talk about the culture with 563:06 respect to a concept like improvement? 563:07 A. They really take a very measured approach 563:08 to what the problem is, looking at the root causes. 563:09 People take the time to research, study, ask, try to 563:10 figure out what the root cause of a problem may be, 563:11 and then work together to come up with the best 563:12 solutions. 563:13 I can provide examples if you want, but I 563:14 think that generally the company and the people at 563:15 the company are very open to creativity, to new 563:16 ideas, to trying new things. And, you know, 563:17 whatever was best for the user generally, that is 563:18 where we land. 563:19 Q. So fair to say that there's a culture like 563:20 a constant drive to improvement?		AH_v11p.181
563:25 - 564:02	Hasbun, Andrew 2025-04-11 - PIP MP4 563:25 Q. You said before you wanted to maybe 564:01 provide some examples of the culture. I'm happy for 564:02 you to do that if you'd like.	00:00:05	AH_v11p.182
564:14 - 565:12	Hasbun, Andrew 2025-04-11 - PIP MP4 564:14 A. I can think back to a time when we 564:15 launched our emergency button. Some of the	00:01:05	AH_v11p.183

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DESIGNATION	SOURCE	DURATION	ID
	564:16 questions you're getting from reporters was, "What		
	564:17 if I was in a situation when" -- "where I wasn't		
	564:18 able to talk. You know, if you're in a vehicle and		
	564:19 it's uncomfortable and you didn't want to speak to a		
	564:20 911 dispatcher, for example, how would" -- "how		
	564:21 could we do that?"		
	564:22 And we all got together and we discussed,		
	564:23 well, why don't we add tex- -- the ability to text		
	564:24 to 911 as part of our emergency button. And this is		
	564:25 an idea that came from the communications team and		
	565:01 others based off of feedback that we heard from the		
	565:02 general public.		
	565:03 Fast-forward a few months, maybe less than		
	565:04 a year later, that feature was launched, and it's		
	565:05 now available nationwide.		
	565:06 And we also have the ability, depending on		
	565:07 the 911 dispatch center, where 911 dispatchers can		
	565:08 track the trip from their 911 dispatch portals.		
	565:09 That's an example, I think, of how these ideas can		
	565:10 come from anywhere, even just from our users, and we		
	565:11 work to build them and make it happen, and then also		
	565:12 improve upon them over time.		
565:18 - 565:21	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:08	AH_v11p.184
	565:18 Q. Do (edited)		
	565:19 you think that the culture you've described about is		
	565:20 also reflected in a commitment to safety and		
	565:21 customer experience?		
565:23 - 567:02	Hasbun, Andrew 2025-04-11 - PIP MP4	00:01:19	AH_v11p.185
	565:23 THE WITNESS: Yes, I do.		
	565:24 BY MR. PRICE WOLF:		
	565:25 Q. Can you please explain how?		
	566:01 A. Just like what I was -- what I -- the		
	566:02 example that I gave before. When we hear feedback,		
	566:03 when we hear these concerns from people, we will get		
	566:04 together and we will work to find the best solution.		
	566:05 It's a -- it is a process, and it's an ever-evolving		
	566:06 process. There's always new issues.		
	566:07 Like safety is one of those things that's		
	566:08 ever-evolving, just like, say, fraud or other		
	566:09 aspects of the things that we deal with. And so		

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	566:10 it's our challenge to constantly keep up with the		
	566:11 latest that's happening and the latest trends.		
	566:12 And we're always looking, we're always		
	566:13 constantly seeing what's happening, looking at our		
	566:14 own reports and seeing stuff out in -- on the news		
	566:15 or in social media, things like that, and working to		
	566:16 adapt so that we get the message out on safety, we		
	566:17 get the message out on the customer experience.		
	566:18 We have ten ways in the app where you can		
	566:19 report things to Uber, and these are stuff that has		
	566:20 developed over time based on customer feedback.		
	566:21 Q. You've been asked a lot of questions		
	566:22 yesterday, and I believe even some today, about the		
	566:23 phrase "Do the right thing." Do you remember that?		
	566:24 A. I do.		
	566:25 Q. Can you talk about whether it's been your		
	567:01 experience at Uber that the company tries to do the		
	567:02 right thing, even on complicated issues?		
567:04 - 567:13	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:28	AH_v11p.186
	567:04 BY MR. PRICE WOLF:		
	567:05 Q. You can go ahead and answer.		
	567:06 A. Yes, I do believe the company does the		
	567:07 right thing. It can be a long, complicated process.		
	567:08 There can be disagreements. Sometimes people		
	567:09 disagree. Like any organization that is very large,		
	567:10 there are different opinions. But in the end, I		
	567:11 think that the company lands in the right spot. And		
	567:12 you may disagree with it, you may not. That's the		
	567:13 nature of a large company.		
568:09 - 568:11	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:06	AH_v11p.187
	568:09 Q. Do you agree that sexual misconduct is		
	568:10 bad?		
	568:11 A. I do.		
569:04 - 569:08	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:09	AH_v11p.188
	569:04 Q. So a second ago, I asked if you (edited)		
	569:05 agree that individuals who engage in sexual		
	569:06 misconduct should be barred from using the Uber		
	569:07 platform, right?		
	569:08 A. Yes.		

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DESIGNATION	SOURCE	DURATION	ID
569:11 - 569:16	Hasbun, Andrew 2025-04-11 - PIP MP4 569:11 Q. I think you agreed with me with that. 569:12 A. Yes. 569:13 Q. Okay. So in your view, is that true, 569:14 regardless of how many rides someone has or how much 569:15 revenue they might earn for themselves or Uber? 569:16 A. Yes, that's true.	00:00:14	AH_v11p.189
569:20 - 569:25	Hasbun, Andrew 2025-04-11 - PIP MP4 569:20 Q. Do you personally believe that any form of 569:21 sexual violence is acceptable or permissible? 569:22 A. I do not believe that any form of sexual 569:23 violence is permissible, but we do need to look at 569:24 each report in its totality before any decision is 569:25 made.	00:00:18	AH_v11p.190
572:02 - 573:14	Hasbun, Andrew 2025-04-11 - PIP MP4 572:02 Q. Let's talk a little bit about Uber's 572:03 approach to sexual assault. In your time at Uber, 572:04 what have you observed about the company's approach 572:05 to the issue of sexual assault? 572:06 A. In my time at Uber, we have always taken 572:07 this issue seriously. What I've seen happen over 572:08 the years is our response evolve and improve, and it 572:09 always is. 572:10 You know, we talked a lot over the past 572:11 day about the Driving Change initiative and our 572:12 investment with sexual assault organizations. I 572:13 think that is a great example of how the company 572:14 will invest in building a foundation for better 572:15 service and better response when something is 572:16 reported to us and when something happens. 572:17 As part of that process, we also brought 572:18 in new training for our agents and set up a RAINN 572:19 hotline so that someone who is reporting sexual 572:20 assault can get personalized service and care from a 572:21 professional at no cost to them. 572:22 And so when we talk about how things have 572:23 changed over the years, this is a constant evolving, 572:24 and I'm really proud of the work that we've done, 572:25 and I feel like we've set a very high bar for other 573:01 companies to follow.	00:01:53	AH_v11p.191

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DESIGNATION	SOURCE	DURATION	ID
	573:02 Q. How high a priority is the issue of sexual 573:03 assault in a company? 573:04 A. It's a very high priority. 573:05 Q. How seriously does Uber take the issue of 573:06 sexual assault? 573:07 A. I think as evidenced by our Safety Report 573:08 and by all the work that we've done, that we take it 573:09 extremely seriously, and it is a very high priority. 573:10 Q. Is the issue of sexual assault a problem 573:11 unique -- strike that. 573:12 Is the issue of sexual assault something 573:13 unique to Uber's ride app? 573:14 A. No, it is not.		
573:18 - 575:08	Hasbun, Andrew 2025-04-11 - PIP MP4	00:02:14	AH_v11p.192
	573:18 A. No, it is not unique to Uber's app. It 573:19 exists everywhere. It is something that exists in 573:20 all aspects of society and in all places of work. 573:21 Q. Is -- would you say that Uber is an expert 573:22 with the issue of prevention of sexual violence? 573:23 A. No, we are not experts. 573:24 Q. Does Uber ever work with experts on the 573:25 issue of sexual violence? 574:01 A. Yes, we do, as evidenced by our Driving 574:02 Change commitment and the commitments we have made 574:03 over the past time I've been at the company, the 574:04 eight and a half years I've been there. 574:05 Q. So can you speak a little bit more 574:06 specifically about the work that these experts have 574:07 done with Uber on sexual assault issues? 574:08 A. Yes. What these experts have done is help 574:09 us understand what is a sexual assault, what the 574:10 survivor is going through, and then also how to best 574:11 work with that survivor to make sure that they're 574:12 getting the help and care that they need. 574:13 I am not sitting here today telling you 574:14 that everything we've done over the past ten years 574:15 is absolutely perfect, but we've been constantly 574:16 trying to do better at improving and investing in 574:17 working with experts to always make sure that we're 574:18 prioritizing a survivor-centric approach.		

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	574:19 By working with them, they've helped 574:20 ensure that, and we still work with them to this 574:21 day. They are the experts, and they help influence 574:22 our movements, our responses, and our planning. And 574:23 even today, when something new comes up, if things 574:24 change, if we see new situations happening, we 574:25 consult with them to help develop new best practices 575:01 so that we're responding properly. 575:02 Q. It was suggested by Plaintiffs' counsel, 575:03 more yesterday, I think, than today, that some of 575:04 these advocacy organizations that you're referencing 575:05 are somehow controlled by Uber or lacked 575:06 independence. Do you agree with that 575:07 characterization? 575:08 A. I do not.		
576:13 - 576:21	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:27	AH_v11p.193
	576:13 Q. Can you tell me more about the creation of 576:14 the taxonomy that was used in the Safety Report? 576:15 A. Yes. And to be clear, I don't want to 576:16 misspeak. I wasn't -- at this time, I wasn't deeply 576:17 involved in it, but generally speaking, we worked 576:18 with Raliance and specifically NSVRC, which is the 576:19 National Sexual Resource Center, to create the 576:20 taxonomy, because NSVRC is the foremost expert in 576:21 this type of work.		
582:07 - 582:12	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:19	AH_v11p.194
	582:07 Q. I believe we saw documents yesterday, some 582:08 today, where you appear to express some frustrations 582:09 that certain safety features did not launch as 582:10 early, or even at all, as maybe you would have 582:11 wanted them to. Is that a fair characterization? 582:12 A. I think that's fair.		
582:15 - 583:03	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:28	AH_v11p.195
	582:15 Q. To be clear, are you part of any product 582:16 team? 582:17 A. No, I am not. 582:18 Q. Are you part of any legal team? 582:19 A. No, I am not. 582:20 Q. Are you part of the marketing team? 582:21 A. No, I am not.		

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DESIGNATION	SOURCE	DURATION	ID
	582:22 Q. Are you an engineer?		
	582:23 A. No.		
	582:24 Q. Are you a developer?		
	582:25 A. No.		
	583:01 Q. Do you test safety products?		
	583:02 A. Informally, but not -- not in terms of		
	583:03 like a data scientist would.		
583:24 - 584:09	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:32	AH_v11p.196
	583:24 Q. Do you agree or disagree with the		
	583:25 statement that Uber pushes to implement safety		
	584:01 features as quickly as is feasible when taking into		
	584:02 account all the considerations like technology,		
	584:03 legal concerns, and customer experience?		
	584:04 A. Yes, I do.		
	584:05 Q. Are there others at Uber who know more		
	584:06 than you about all the things that go on behind the		
	584:07 scenes and on the platform in order for a safety		
	584:08 product to launch at Uber?		
	584:09 A. Yes.		
584:13 - 584:19	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:26	AH_v11p.197
	584:13 A. Yes, there are many people that know more		
	584:14 than me.		
	584:15 Q. Who are those people?		
	584:16 A. Product teams, engineering teams, data		
	584:17 teams. I mean, the list could go on. I mean, we		
	584:18 could even go as high up as ELT members. There are		
	584:19 many that know more than me.		
586:02 - 586:06	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:13	AH_v11p.198
	586:02 Q. It's fair to say, as we may have seen in		
	586:03 evidence over the past couple days, sometimes you		
	586:04 get frustrated at other departments within Uber if		
	586:05 they might not handle a situation perfectly, in your		
	586:06 view?		
586:09 - 586:10	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:05	AH_v11p.199
	586:09 THE WITNESS: Yes, I get frustrated and		
	586:10 use some incredible language every now and then.		
586:12 - 586:15	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:10	AH_v11p.200
	586:12 Q. But it's also fair to say that the issues		
	586:13 that come across your desk as your senior level in		

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DESIGNATION	SOURCE	DURATION	ID
	586:14 communications are the one-in-a-million occurrences, 586:15 right?		
586:18 - 587:10	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:53	AH_v11p.201
	586:18 THE WITNESS: Yes, they are the rare 586:19 occasions that tend to be high profile. They tend 586:20 to be high stress. They tend to be on a time 586:21 deadline, and in those moments, it can be very 586:22 stressful, and it can be very intense, and there can 586:23 be emotions. 586:24 And there could be a lot of folks, whether 586:25 it's senior leaders, lawyers, support agents, 587:01 getting involved in the situation, and it falls on 587:02 the communications team many times to help sort of 587:03 keep everybody on track so that we can get our 587:04 responses out and have sort of a unified message as 587:05 to what's going on and what happened. And it can be 587:06 a very high-pressure environment. 587:07 And, you know, I've spent many years in 587:08 high-pressure environments working in news and at 587:09 Uber. Sometimes you handle them with grace. 587:10 Sometimes you get a little bit angry sometimes.		
588:06 - 588:25	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:50	AH_v11p.202
	588:06 do you think Uber is committed to safety? 588:07 A. Yes, I do. 588:08 Q. And how do you feel about Uber's 588:09 commitment to safety? 588:10 A. I feel very strongly about it. I feel 588:11 like the company has made it a top priority. I feel 588:12 like Uber has put the resources behind it. They've 588:13 made the investments. They haven't shied away from 588:14 very complicated issues. 588:15 Once again, it's the first company to ever 588:16 put out a Safety Report. We led the way on this 588:17 effort of transparency. We were the first company 588:18 to do it, the first company to invest in the 588:19 taxonomy and actually count and publicize sexual 588:20 assault numbers in the top five categories. We were 588:21 the first to do it all, and we set the standard. 588:22 Q. Do you think, in your view, is it fair to 588:23 cherry-pick particular in-the-moment chats and		

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	588:24 make -- use those chats to make generalizations		
	588:25 about Uber?		
589:03 - 589:05	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:04	AH_v11p.203
	589:03 THE WITNESS: I think it's very unfair.		
	589:04 BY MR. PRICE WOLF:		
	589:05 Q. Why not? Why is it unfair?		
589:07 - 590:01	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:52	AH_v11p.204
	589:07 THE WITNESS: In eight and a half years at		
	589:08 any company, there are going to be disagreements.		
	589:09 What you see in these chats is a snapshot in time.		
	589:10 And there could be -- as I pointed out in some of		
	589:11 our discussions earlier, COVID's cloud was hanging		
	589:12 over a lot of discussions in late February, early		
	589:13 March.		
	589:14 There are a lot of things that are		
	589:15 stressors in this job. It's not just the specific		
	589:16 moment at hand. And it's not really, I would say,		
	589:17 fair or appropriate to take that snapshot in time		
	589:18 and make a judgment based off it. It should be		
	589:19 looked at in context and in its totality.		
	589:20 In eight and a half years, of course there		
	589:21 are going to be disagreements within the company.		
	589:22 Of course you're going to have decisions made that		
	589:23 are disappointing, but over time, we're all in the		
	589:24 same -- we're all working toward the same goal, and		
	589:25 the decisions that are made are the decisions, and I		
	590:01 believe they're the right decisions.		
598:03 - 598:08	Hasbun, Andrew 2025-04-11	00:00:15	AH_v11p.205
	598:03 Q. Let's talk for a second about chats --		
	598:04 A. Sure.		
	598:05 Q. -- and criticisms in chats. You've been		
	598:06 shown a number of printouts in your chats with some		
	598:07 of your colleagues at Uber, right?		
	598:08 A. Yes, I have seen the chats.		
598:12 - 598:14	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:08	AH_v11p.206
	598:12 Can you describe what the chat function is		
	598:13 and how you personally use it at work? Chat and		
	598:14 Slack. I'll lump those together when I say "chat."		
598:15 - 599:11	Hasbun, Andrew 2025-04-11 - PIP MP4	00:01:02	AH_v11p.207

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DESIGNATION	SOURCE	DURATION	ID
	598:15 So to repeat the question, can you -- you've got it.		AH_v11p.207
	598:16 Can you describe what the chat function is and how		
	598:17 you personally use it at Uber?		
	598:18 A. Yes. We conduct a lot of our		
	598:19 communication via chat, G-Chat, Slack. Many of		
	598:20 those reasons are because people are busy. We're in		
	598:21 meetings. We're dealing with things. You can't get		
	598:22 somebody on the phone. We often type in very quick,		
	598:23 incomplete sentences.		
	598:24 It's a very fast-pace environment, and we		
	598:25 use chat to talk amongst ourselves. Our colleagues		
	599:01 are across the country and around the world, and		
	599:02 chat is often the most effective way to communicate		
	599:03 with each other.		
	599:04 I will caveat that we're not the most		
	599:05 grammatically correct group. There are typos. We		
	599:06 don't -- there's lots of spaces. So looking at some		
	599:07 of these chats in this environment can look very		
	599:08 chaotic and wild and be hard to follow.		
	599:09 Q. Is it true that sometimes you've used		
	599:10 chats with colleagues to express frustrations in the		
	599:11 moment?		
599:14 - 599:18	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:10	AH_v11p.208
	599:14 THE WITNESS: Yes, it is true.		
	599:15 BY MR. PRICE WOLF:		
	599:16 Q. And do the chats that you've been shown in		
	599:17 your deposition over the past two days accurately		
	599:18 reflect how you feel about Uber?		
599:21 - 602:01	Hasbun, Andrew 2025-04-11 - PIP MP4	00:02:20	AH_v11p.209
	599:21 THE WITNESS: No, they don't. They are a		
	599:22 snapshot in time. I've been at Uber for eight and a		
	599:23 half years, and those are moments of frustration or		
	599:24 disagreement. And, you know, that's going to happen		
	599:25 over eight and a half years in a fast-paced		
	600:01 environment.		
	600:02 BY MR. PRICE WOLF:		
	600:03 Q. You know Gus Fuldner, right?		
	600:04 A. I do.		
	600:05 Q. How long have you known him?		
	600:06 A. I have --		

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DESIGNATION	SOURCE	DURATION	ID
600:07	MR. SMITH: Apologize.		
600:08	BY MR. PRICE WOLF:		
600:09	Q. How long have you --		
600:10	A. The entire time I've worked at Uber.		
600:11	Q. How would you describe your relationship		
600:12	with Mr. Fuldner?		
600:13	A. Positive.		
600:14	Q. What do you think of Mr. Fuldner as a		
600:15	leader at Uber?		
600:16	A. I think -- I was just giving the beat.		
600:17	Sorry. I think that Gus Fuldner is an incredibly		
600:18	intelligent man. He's very methodical. He takes		
600:19	the time to listen to all the different angles, look		
600:20	at the data, like receive feedback, and I think he's		
600:21	very deliberate in his decision-making.		
600:22	I don't always agree with everything, just		
600:23	as anyone in any workplace may not always agree with		
600:24	a leader's decision, but that's part of the process,		
600:25	and you accept it and move on.		
601:01	Q. Similar with Katie Waitzman. She's on the		
601:02	legal team, correct?		
601:03	A. Correct.		
601:04	Q. How long have you known Ms. Waitzman?		
601:05	A. I've known Katie the entire time I've		
601:06	worked at Uber.		
601:07	Q. And how would you describe your		
601:08	relationship with her?		
601:09	A. Very positive. Katie and I get along		
601:10	great.		
601:11	Q. And generally, how would you describe her		
601:12	as -- and her -- your relationship with her		
601:13	vis-a-vis what she does on the legal team at Uber?		
601:14	A. Oh, I consult with Katie fairly regularly.		
601:15	She has moved up over the years, but during my early		
601:16	time at Uber, she oversaw a lot of the Safety &		
601:17	Insurance litigation, and so I would work with Katy		
601:18	fairly regularly on high-profile issues. Legal		
601:19	counsel, things like that, she would help -- help		
601:20	guide us through some of the complex legal issues		
601:21	and questions we were being asked.		
601:22	She also was heavily involved in the		

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	601:23 Safety Report. And so we worked with Katie very 601:24 regularly. Now she has a larger remit, and I don't 601:25 see her as much as I would like, but we work 602:01 together fairly regularly.		
602:13 - 602:17	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:15	AH_v11p.210
	602:13 Q. Are you -- you did mention earlier in 602:14 testimony with me today that you're proud -- you 602:15 used the word "proud" -- to be a part of the Uber 602:16 team, to be an employee at Uber. Can you talk to me 602:17 more about that sense of pride?		
602:19 - 603:16	Hasbun, Andrew 2025-04-11 - PIP MP4	00:01:01	AH_v11p.211
	602:19 THE WITNESS: Yes. I'm proud to work at 602:20 Uber for many reasons. I mean, if you just look at 602:21 the impact that this company has had around the 602:22 world, it's pretty -- it's pretty incredible, just 602:23 as an overall business. 602:24 We travel around the world and, you know, 602:25 you have the singular experience of ordering an Uber 603:01 and the car showing up. It's a pretty incredible 603:02 thing that we actually, like, take for granted. 603:03 Ten, twelve years ago, this didn't exist in the form 603:04 that we see it today. 603:05 And I'm proud of the fact that the company 603:06 is constantly evolving, investing in important 603:07 issues like safety, or other things, like other 603:08 priorities like autonomous vehicles, things like 603:09 that. It's constantly evolving. 603:10 I'm really proud of the energy, the 603:11 people, and the investment that they put behind 603:12 these issues. It takes time to get to a good spot, 603:13 but the company generally follows through on its 603:14 commitments, which is what we've seen with the 603:15 Safety Report and many of the safety features that 603:16 we have built.		
608:20 - 608:24	Hasbun, Andrew 2025-04-11	00:00:14	AH_v11p.212
	608:20 Q. You also spoke some about the (edited) 608:21 safety reports in response to Mr. Price Wolf's 608:22 questions. You remember that? 608:23 A. Are you referring to the Safety Report, 608:24 the actual document?		

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DESIGNATION	SOURCE	DURATION	ID
608:25 - 609:08	Hasbun, Andrew 2025-04-11 608:25 Q. In terms of your things you were proud of 609:01 for working for Uber and citing to safety features 609:02 and Uber's commitment to safety, one of the things 609:03 that you talked about was the safety reports. Do 609:04 you remember that? 609:05 A. Yes, I do. 609:06 Q. And one of the things that you said was 609:07 you were the first company to ever put out a Safety 609:08 Report. Do you remember that?	00:00:20	AH_v11p.213
609:12 - 609:25	Hasbun, Andrew 2025-04-11 - PIP MP4 609:12 Q. Now, that's incorrect, right? Because 609:13 Didi, Uber's competitor in China, put out a Safety 609:14 Report first. Did you know that? 609:15 A. I've seen Didi's Safety Report. It is not 609:16 the same. It might be called the same, but it's not 609:17 the same. 609:18 Q. You know it addressed sexual assaults in 609:19 China. Did you know that? 609:20 A. I did not know that. I've seen a variety 609:21 of reports from Didi. 609:22 Q. And Didi put out a Safety Report, its 609:23 first Safety Report -- Didi is a rideshare company, 609:24 right? 609:25 A. Yes, it is. I'm aware of what Didi is.	00:00:34	AH_v11p.214
611:06 - 611:06	Hasbun, Andrew 2025-04-11 - PIP MP4 611:06 Q. Going on on the Safety Report issue, do	00:00:07	AH_v11p.215
611:07 - 612:05	Hasbun, Andrew 2025-04-11 - PIP MP4 611:07 you remember -- well, yeah. You talked about the 611:08 Safety Report and your pride in the Safety Report. 611:09 And I'd like to ask you now about the second Safety 611:10 Report that Uber put out. Do you remember when that 611:11 one was put out? 611:12 A. I'd have to refresh my memory on the date. 611:13 I feel like we went over it. I think it was 2022. 611:14 Q. Yeah, it was actually June 30th, 2022. 611:15 A. Thank you. Yes. 611:16 Q. And that covered incidents that were 611:17 reported to Uber, of course, only for the five of	00:01:13	AH_v11p.216

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	611:18 the 21 categories of sexual violence that Uber chose		
	611:19 to report, but it covered incidents from 2019 and		
	611:20 2020, correct?		
	611:21 A. That's correct.		
	611:22 Q. And do you remember that Uber actually put		
	611:23 that report out on June 30th, 2022, which is		
	611:24 actually more than two and a half years after its		
	611:25 first Safety Report, right?		
	612:01 A. Yes.		
	612:02 Q. And that was the Thursday before 4th of		
	612:03 July weekend 2022, right?		
	612:04 A. I'd have to look at the calendar, but I		
	612:05 believe it was.		
614:03 - 614:06	Hasbun, Andrew 2025-04-11 - PIP MP4	00:00:19	AH_v11p.217
	614:03 Q. And these are a couple of e-mails that you		
	614:04 sent first on Monday, June 27th, 2022, and then your		
	614:05 response on Friday, July 1st, 2022, correct?		
	614:06 A. I'll need to take a second to look.		
614:10 - 615:12	Hasbun, Andrew 2025-04-11 - PIP MP4	00:01:21	AH_v11p.218
	614:10 Q. All right. And again, this is two and a		
	614:11 half years after the first Safety Report has been		
	614:12 released, correct?		
	614:13 A. That's correct.		
	614:14 Q. And this first e-mail that you sent on		
	614:15 Monday, June 27th, 2022, first you wrote "ACP" at		
	614:16 the top of it, right?		
	614:17 A. Yes.		
	614:18 Q. And you thought it was attorney-client		
	614:19 privileged?		
	614:20 A. Yes.		
	614:21 Q. All right. You wrote, "Hi. This		
	614:22 Thursday" -- which would have been June 30th, 2022,		
	614:23 the date the report was actually released, correct?		
	614:24 A. Yes.		
	614:25 Q. "This Thursday at 2pm Pacific Time we plan		
	615:01 to release the second US Safety Report covering the		
	615:02 years 2019-2020," correct?		
	615:03 A. Yes.		
	615:04 Q. "Our goal with the date and time selection		
	615:05 is to create a quick, controlled news cycle focused		

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DESIGNATION	SOURCE	DURATION	ID
	615:06 on the topline data leading into the extended 4th of 615:07 July weekend." Correct? 615:08 A. That's what's written in the document. 615:09 Q. So this thing that you were so proud of 615:10 you were releasing on Thursday, at 5:00 o'clock 615:11 Eastern Time, on one of the biggest holiday weekends 615:12 in the United States, right?		
615:14 - 616:04	Hasbun, Andrew 2025-04-11 - PIP MP4 615:14 THE WITNESS: That's when it was released. 615:15 Thursday at 2:00 p.m. Pacific Time. 615:16 BY MR. MELUGIN: 615:17 Q. And then your response e-mail is the day 615:18 after it was released, that Friday, July 1st, 2022, 615:19 correct? 615:20 A. Yes. 615:21 Q. And you sent it to ELT. That's the only 615:22 "to" person in that line, right? 615:23 A. In the "to" line, that's it. That's all 615:24 that's there. 615:25 Q. Well, and then you cc'd a whole bunch of 616:01 people, and you bcc'd Mr. Fuldner separately, right? 616:02 A. Well, he's on ELT at this point, so... 616:03 Q. You also bcc'd him, correct? 616:04 A. Yes, I did.	00:00:41	AH_v11p.219
616:09 - 616:17	Hasbun, Andrew 2025-04-11 - PIP MP4 616:09 Q. And you wrote, "Hi everyone. The strategy 616:10 behind the release of the second US Safety Report 616:11 was to create a quick, controlled news cycle. So 616:12 far, it has worked." 616:13 A. If I could, yeah, I'd like to provide some 616:14 context on what "controlled" means. 616:15 Q. I'm just asking you what you wrote right 616:16 now, Mr. Hasbun. Okay? 616:17 A. Sure. That's what I wrote.	00:00:24	AH_v11p.220
618:18 - 618:20	Hasbun, Andrew 2025-04-11 618:18 Q. All right. Now, for the third Safety 618:19 Report, you chose to release that one on -- I want 618:20 to say it was August 31st, 2024, right?	00:00:15	AH_v11p.221
618:21 - 619:06	Hasbun, Andrew 2025-04-11	00:00:23	AH_v11p.222

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DESIGNATION	SOURCE	DURATION	ID
	618:21 A. I believe that's the date. I'd have to 618:22 double-check. I can't confirm off the top of my 618:23 head. 618:24 Q. And that's a Friday of Labor Day Weekend 618:25 this last -- this most recent year, right? 619:01 A. Again, I'd have to look at the calendar, 619:02 but yes, I believe so. 619:03 Q. That sounds right. I mean, it's the last 619:04 day in August. That's about usually when Labor Day 619:05 happens, right? 619:06 A. Yes.		AH_v11p.222
619:21 - 619:25	Hasbun, Andrew 2025-04-11 - PIP MP4 619:21 Q. My question was that you chose a Friday of 619:22 a holiday weekend the second time in a row that Uber 619:23 had chosen a Thursday or a Friday of a major holiday 619:24 weekend in the United States to release its Safety 619:25 Reports, correct?	00:00:17	AH_v11p.223
620:02 - 620:07	Hasbun, Andrew 2025-04-11 - PIP MP4 620:02 THE WITNESS: That's the timing of when we 620:03 released them, yes. 620:04 BY MR. MELUGIN: 620:05 Q. And you'll agree, regardless of reason, 620:06 that the third Safety Report was again more than two 620:07 years after the second, correct?	00:00:12	AH_v11p.224
620:09 - 620:10	Hasbun, Andrew 2025-04-11 - PIP MP4 620:09 THE WITNESS: Yes, it was more than two 620:10 years, if you look on the calendar, yes.	00:00:05	AH_v11p.225
623:19 - 623:21	Hasbun, Andrew 2025-04-11 623:19 Q. The most recent data that's from any of 623:20 these safety reports -- so the third essentially -- 623:21 only goes up to the end of 2022, correct?	00:00:10	AH_v11p.226
623:23 - 624:04	Hasbun, Andrew 2025-04-11 - PIP MP4 623:23 THE WITNESS: I -- yeah, I believe so. 623:24 I'd have to just double-check to make sure, but yes, 623:25 that's it. 624:01 BY MR. MELUGIN: 624:02 Q. So the most recent public data for sexual 624:03 assaults reported to Uber in relation to Uber rides 624:04 is more than two years old, right?	00:00:18	AH_v11p.227

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DESIGNATION	SOURCE	DURATION	ID
624:06 - 624:07	Hasbun, Andrew 2025-04-11 - PIP MP4 624:06 THE WITNESS: Yes, that's correct. The 624:07 last one went to 2022.	00:00:05	AH_v11p.228
624:21 - 624:23	Hasbun, Andrew 2025-04-11 - PIP MP4 624:21 Q. So the answer is you don't know, to my 624:22 question is Uber going to continue to publish its 624:23 Safety Reports, right?	00:00:06	AH_v11p.229
624:25 - 625:04	Hasbun, Andrew 2025-04-11 - PIP MP4 624:25 THE WITNESS: Correct. My answer is I 625:01 don't know. It's an active discussion. 625:02 BY MR. MELUGIN: 625:03 Q. Well, discussion that I -- am I correct in 625:04 assuming that you're not a part of?	00:00:10	AH_v11p.230
625:06 - 625:12	Hasbun, Andrew 2025-04-11 - PIP MP4 625:06 THE WITNESS: As far as I know, that's -- 625:07 it's still an open question. 625:08 BY MR. MELUGIN: 625:09 Q. So as we sit here today, we have no idea 625:10 when the next more recent than December 31st, 2022 625:11 data for sexual assaults on Ubers is even going to 625:12 come out, right?	00:00:20	AH_v11p.231
625:14 - 625:15	Hasbun, Andrew 2025-04-11 - PIP MP4 625:14 THE WITNESS: I -- sitting here, I can't 625:15 tell you when the next one's coming out, no.	00:00:05	AH_v11p.232
628:04 - 628:11	Hasbun, Andrew 2025-04-11 - PIP MP4 628:04 Q. What you have in front of you here in 628:05 Exhibit 1561 is the Policy and Comms Plan for the 628:06 2021-2022 Safety Report. This document is dated 628:07 May -- the creation date is May 28th, 2024. And 628:08 it's for a report that hasn't been released yet, but 628:09 covers data that goes -- most recent of which comes 628:10 from 2022, right? 628:11 A. Yes.	00:00:30	AH_v11p.233
628:17 - 629:03	Hasbun, Andrew 2025-04-11 - PIP MP4 628:17 Q. And if we go to the page ending 570. This 628:18 is the "FAQ" section, right? 628:19 A. Yes. 628:20 Q. And you see the bolded question there	00:00:38	AH_v11p.234

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DESIGNATION	SOURCE	DURATION	ID
628:21	under this first section, "Question: Do you still		
628:22	plan to do the report every two years?" Do you see		
628:23	that?		
628:24	A. I do.		
628:25	Q. Can you read the answer that's there for		
629:01	the FAQ?		
629:02	A. Says, "Ignore if possible." Just that --		
629:03	just that --		

PLF Affirmative	00:59:54
PLF Counter	00:08:46
DEF Counter	00:25:06
TOTAL RUN TIME	01:33:46