

COURT EXHIBIT 7A

Designation Run Reports for Hannah Nilles
as played in Court 1/21/2026 (June 30, 2025, July 10, 2025, August 7,
2025)

Nilles, Hannah 06-30-25 v6p - As-Played in Court 01-21-25

Designation List Report

	Nilles, Hannah	2025-06-30
	Nilles, Hannah	2025-06-30

Our Designations	00:09:09
Their Designations	00:00:55
TOTAL RUN TIME	00:10:05



NH630_v6p-As-PlayedinCourt1-21-25 - Nilles, Hannah 06-30-25 v6p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
6:17 - 6:21	Nilles, Hannah 2025-06-30 - PIP MP4 6:17 Q. Good morning. Can you please state 6:18 your name for the record? 6:19 A. Hannah Nilles. 6:20 Q. What's your title, Ms. Nilles? 6:21 A. Head of Safety of the Americas.	00:00:07	NH630_v6p-As-Pl ayedInCourt1-21- 25.1
6:24 - 7:01	Nilles, Hannah 2025-06-30 - PIP MP4 6:24 Q. And how long have you been with 6:25 Uber? 7:01 A. Almost six years.	00:00:02	NH630_v6p-As-Pl ayedInCourt1-21- 25.2
10:16 - 11:01	Nilles, Hannah 2025-06-30 - WIT MP4 10:16 Q. And just briefly, can you summarize 10:17 your background before coming to Uber? 10:18 A. Sure. I studied international 10:19 business, and I had worked at a technology 10:20 company prior to coming to Uber. 10:21 I worked around the world, doing 10:22 various technology deployments and roll-outs, 10:23 and now I work at Uber. 10:24 Q. Did you have any safety-related jobs 10:25 before you came to Uber? 11:01 A. No.	00:00:23	NH630_v6p-As-Pl ayedInCourt1-21- 25.3
144:04 - 144:12	Nilles, Hannah 2025-06-30 - PIP MP4 144:04 But just so that we are all clear 144:05 about Uber's efforts to prevent sexual assault 144:06 by drivers against passengers, I want to make 144:07 sure I have down on the -- with respect to 144:08 screening, other than running criminal 144:09 background checks, is there any other component 144:10 of Uber's screening that is what Uber does to 144:11 screen out potential sexual predators from the 144:12 platform?	00:00:33	NH630_v6p-As-Pl ayedInCourt1-21- 25.4
144:14 - 144:20	Nilles, Hannah 2025-06-30 - PIP MP4 144:14 A. Motor vehicle records. 144:15 Q. Okay. Anything else?	00:00:16	NH630_v6p-As-Pl ayedInCourt1-21- 25.5

NH630_v6p-As-PlayedinCourt1-21-25 - Nilles, Hannah 06-30-25 v6p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
	144:16 A. Well, we have -- I mean, we have the 144:17 screening process, which is looking at criminal 144:18 and motor vehicle record background checks. 144:19 So, as far as screening goes, those 144:20 are the two main components.		
267:06 - 267:10	Nilles, Hannah 2025-06-30 - PIP MP4 267:06 Q. All right. Now, you, of course, are 267:07 aware of many individual instances that have 267:08 been reported, where a driver has passed Uber's 267:09 screening process and gone on to commit 267:10 horrendous violence against a passenger, right?	00:00:17	NH630_v6p-As-Pl ayed in Court 1-21- 25.6
267:12 - 267:23	Nilles, Hannah 2025-06-30 - PIP MP4 267:12 A. I am, yes. 267:13 MS. LONDON: All right. So why 267:14 don't we go ahead -- I'm going to show you 267:15 Exhibit 113A, and this one is a video, so 267:16 I'm going to play it. 267:17 I'm going to mark it as the next 267:18 numbered exhibit, which is 1319, and then 267:19 I'll just ask you a few questions 267:20 afterwards. 267:21 (Exhibit 1319, Video, marked for 267:22 identification.) 267:23 (Video playing.)	00:02:06	NH630_v6p-As-Pl ayed in Court 1-21- 25.7
268:01 - 268:04	Nilles, Hannah 2025-06-30 - PIP MP4 268:01 Q. Ms. Nilles, what was described in 268:02 this news story, which I will represent to you 268:03 aired in February of 2025, this was a -- a 268:04 horrific and heinous action, right --	00:00:15	NH630_v6p-As-Pl ayed in Court 1-21- 25.8
268:06 - 268:09	Nilles, Hannah 2025-06-30 - PIP MP4 268:06 Q. -- of what was reported? 268:07 A. Yes. 268:08 Q. And that driver should not be on the 268:09 platform, driving for Uber, right?	00:00:08	NH630_v6p-As-Pl ayed in Court 1-21- 25.9
268:11 - 268:17	Nilles, Hannah 2025-06-30 - PIP MP4	00:00:27	NH630_v6p-As-Pl ayed in Court 1-21-

NH630_v6p-As-PlayedinCourt1-21-25 - Nilles, Hannah 06-30-25 v6p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
	268:11 A. I'm trying to recall exactly what 268:12 was said. But I think the answer is no. 268:13 Q. Since this story aired in 2025, Uber 268:14 did not make any changes to its screening 268:15 processes or policies to improve safety for 268:16 riders and protect them from sexual assault, 268:17 right?		25.10
268:19 - 269:01	Nilles, Hannah 2025-06-30 - PIP MP4 268:19 A. Since that particular story aired? 268:20 Q. Yes. 268:21 A. Not to my knowledge. 268:22 MS. LONDON: I'm going to show you 268:23 the next numbered exhibit, which will be 268:24 1320. 268:25 (Exhibit 1320, Video, marked for 269:01 identification.)	00:00:10	NH630_v6p-As-Pl ayedincourt1-21- 25.11
269:10 - 269:16	Nilles, Hannah 2025-06-30 - WIT MP4 269:10 Q. Ms. Nilles, it is Uber's practice to 269:11 track incidents when they occur, right? 269:12 A. Yes. 269:13 Q. And Uber does review and take 269:14 seriously every one of these reports when they 269:15 come to Uber, right? 269:16 A. Yes.	00:00:16	NH630_v6p-As-Pl ayedincourt1-21- 25.12
269:22 - 270:06	Nilles, Hannah 2025-06-30 - PIP MP4 269:22 (Video playing.) 269:23 Q. Now, Ms. Nilles, what was described 269:24 here involved a driver that had been -- had 269:25 passed Uber's screening process, right? 270:01 A. I have no context on this driver. I 270:02 would assume he did, but I don't know any more 270:03 than that. 270:04 Q. Well, there was a spokesperson from 270:05 Uber that made a comment, saying the driver had 270:06 been removed, right?	00:03:08	NH630_v6p-As-Pl ayedincourt1-21- 25.13
270:08 - 270:08	Nilles, Hannah 2025-06-30 - PIP MP4 270:08 A. Yes, I saw that.	00:00:01	NH630_v6p-As-Pl ayedincourt1-21-

NH630_v6p-As-PlayedinCourt1-21-25 - Nilles, Hannah 06-30-25 v6p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
270:09 - 270:12	<p>Nilles, Hannah 2025-06-30 - PIP MP4</p> <p>270:09 Q. And if the driver had been removed,</p> <p>270:10 obviously, they -- the driver must have passed</p> <p>270:11 the screenings to -- to be able to give rides</p> <p>270:12 on the app, right?</p>	00:00:06	NH630_v6p-As-Pl ayedInCourt1-21- 25.18
270:14 - 271:05	<p>Nilles, Hannah 2025-06-30 - PIP MP4</p> <p>270:14 A. I mean, I feel sick that you're</p> <p>270:15 showing me these videos. I think you're</p> <p>270:16 insinuating that somebody who -- I mean, I'm</p> <p>270:17 assuming if this person had a criminal record,</p> <p>270:18 they would have said it in the news story.</p> <p>270:19 You're assuming that we could</p> <p>270:20 predict that a person is going to do something</p> <p>270:21 horrible to a woman in a car; and, if they</p> <p>270:22 don't have that on their background check, I</p> <p>270:23 don't see how you could possibly prevent that</p> <p>270:24 from happening.</p> <p>270:25 Q. Just -- I'm just --</p> <p>271:01 A. You're asking me about screening</p> <p>271:02 practices, and you're insinuating that we could</p> <p>271:03 have prevented this by changing our screening</p> <p>271:04 practices.</p> <p>271:05 If a person doesn't have a criminal</p>	00:00:49	NH630_v6p-As-Pl ayedInCourt1-21- 25.19
271:06 - 271:21	<p>Nilles, Hannah 2025-06-30 - PIP MP4</p> <p>271:06 you can't just intuit that they're (edited)</p> <p>271:07 going to sexually assault someone. I read</p> <p>271:08 these things every single day, and they make me</p> <p>271:09 sick.</p> <p>271:10 So you showing me these videos isn't</p> <p>271:11 going to make me say anything different.</p> <p>271:12 Q. Understood.</p> <p>271:13 Ms. Nilles, one of the things that</p> <p>271:14 the Uber spokesperson in this news article said</p> <p>271:15 is that sexual misconduct is never tolerated on</p> <p>271:16 the Uber platform.</p> <p>271:17 Do you recall that?</p> <p>271:18 A. Yes.</p>	00:00:48	NH630_v6p-As-Pl ayedInCourt1-21- 25.15

NH630_v6p-As-PlayedinCourt1-21-25 - Nilles, Hannah 06-30-25 v6p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
	271:19 Q. It's your understanding that Uber		
	271:20 does not remove a driver after every report of		
	271:21 sexual misconduct --		
271:23 - 271:23	Nilles, Hannah 2025-06-30 - PIP MP4	00:00:01	NH630_v6p-As-Pl
	271:23 Q. -- correct?		ayedincourt1-21-
			25.16
271:25 - 272:04	Nilles, Hannah 2025-06-30 - PIP MP4	00:00:10	NH630_v6p-As-Pl
	271:25 A. You would have to get into splitting		ayedincourt1-21-
			25.17
	272:01 hairs of how we define the taxonomy, and a lot		
	272:02 more nuanced details than we have time for		
	272:03 right now.		
	272:04 But, yes, that's true.		

Our Designations	00:09:09
Their Designations	00:00:55
TOTAL RUN TIME	00:10:05

Nilles, Hannah 07-10-25 v4p - As-Played in Court 01-21-25

Designation List Report

 Nilles, Hannah	2025-07-10
Nilles, Hannah	2025-07-10

Our Designations	00:01:56
Our Counters	00:00:20
TOTAL RUN TIME	00:02:16



NH710_v4p-As-PlayedinCourt1-21-25 - Nilles, Hannah 07-10-25 v4p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
89:17 - 89:19	Nilles, Hannah 2025-07-10 - WIT MP4 89:17 Q. Is every one of those items that you just listed 89:18 something that Uber considers to be a different 89:19 levels of the multilevel safety screening?	00:00:09	NH710_v4p-As-Pl ayedInCourt1-21- 25.4
89:21 - 89:23	Nilles, Hannah 2025-07-10 - WIT MP4 89:21 A. I think that -- sure, yes, I suppose. I think 89:22 there are many ways to describe our onboarding, and 89:23 that's a fair depiction.	00:00:12	NH710_v4p-As-Pl ayedInCourt1-21- 25.5
89:25 - 90:14	Nilles, Hannah 2025-07-10 - WIT MP4 89:25 Q. One level of Uber's multilevel safety screening is 90:01 getting a driver's license uploaded, true? 90:02 A. Yes. 90:03 Q. One level of Uber's multilevel safety screening is 90:04 getting insurance verification uploaded, true? 90:05 A. Yes. 90:06 Q. One level of Uber's multilevel safety screening is 90:07 getting vehicle registration uploaded, true? 90:08 A. Yes. 90:09 Q. How is vehicle registration a safety screening by 90:10 Uber? 90:11 A. It's one of the compliance requirements. It's part 90:12 of screening, but I don't -- I don't know if you 90:13 can directly tie it to safety, so to speak, but 90:14 it's one of our onboarding requirements.	00:00:51	NH710_v4p-As-Pl ayedInCourt1-21- 25.1
90:18 - 91:04	Nilles, Hannah 2025-07-10 - WIT MP4 90:18 Q. My question was specific to the multilevel safety 90:19 screen. I'd like to know what were each of those 90:20 levels of Uber's multilevel safety screen? 90:21 A. I think it's important to understand the fidelity 90:22 of any information and any document that a driver 90:23 is providing us, and all of those are in some way 90:24 relevant to safety. 90:25 So I would say the fact that the person 91:01 is meeting compliance requirements and has a 91:02 vehicle registration that is current and theirs and 91:03 matches their identity is a safety-related step of	00:00:32	NH710_v4p-As-Pl ayedInCourt1-21- 25.6

DESIGNATION	SOURCE	DURATION	ID
	91:04 the process.		
91:21 - 92:04	Nilles, Hannah 2025-07-10 - PIP MP4	00:00:33	NH710_v4p-As-Pl ayedInCourt1-21- 25.2
	91:21 Q. Another one of the levels in Uber's multilevel		
	91:22 safety screen is what you called the fraud check;		
	91:23 is that right?		
	91:24 A. Yes.		
	91:25 Q. What are those?		
	92:01 A. We are looking for signals of fraud on a person's		
	92:02 driver's license and checking in our system to see		
	92:03 if anyone has been onboarded previously and safety		
	92:04 locked or banned.		

Our Designations	00:01:56
Our Counters	00:00:20
TOTAL RUN TIME	00:02:16

Nilles, Hannah 08-07-25 v4p - As-Played in Court 01-21-25

Designation List Report

	Nilles, Hannah	2025-08-07
	Nilles, Hannah	2025-08-07
	Our Designations	00:04:33
	TOTAL RUN TIME	00:04:33



NH807_v4p-As-PlayedinCourt1-21-25 - Nilles, Hannah 08-07-25 v4p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
418:14 - 418:17	Nilles, Hannah 2025-08-07 MDL - WIT MP4 418:14 Q. So Uber has been analyzing risk factors for sexual 418:15 assault for many years; isn't that right, 418:16 Ms. Nilles? 418:17 A. Yes.	00:00:09	NH807_v4p-As-Pl ayedincourt1-21- 25.1
434:07 - 434:07	Nilles, Hannah 2025-08-07 MDL - PIP MP4 434:07 we're going to mark as Exhibit 1884.	00:00:05	NH807_v4p-As-Pl ayedincourt1-21- 25.2
436:09 - 436:14	Nilles, Hannah 2025-08-07 MDL - PIP MP4 436:09 Q. And what this document says under -- it says it was 436:10 created on March 28, 2016. 436:11 Do you see that? 436:12 A. Yes. 436:13 Q. By Sunny Jeon, a data scientist for Uber, correct? 436:14 A. Yes.	00:00:15	NH807_v4p-As-Pl ayedincourt1-21- 25.3
437:05 - 437:11	Nilles, Hannah 2025-08-07 MDL - PIP MP4 437:05 Q. And what it says is, "As Uber usage continues to 437:06 grow, the company may encounter a greater number 437:07 and variety of safety risks, including fatal 437:08 automobile accidents and interpersonal conflicts 437:09 like physical altercations and sexual misconduct." 437:10 Do you see that? 437:11 A. Yes.	00:00:17	NH807_v4p-As-Pl ayedincourt1-21- 25.4
437:14 - 437:19	Nilles, Hannah 2025-08-07 MDL - PIP MP4 437:14 BY ATTORNEY WALSH: 437:15 Q. And it says, "Although safety incidents are rare 437:16 and may appear random, many safety incidents are 437:17 predictable." 437:18 Do you see that? 437:19 A. I see that.	00:00:10	NH807_v4p-As-Pl ayedincourt1-21- 25.5
438:01 - 438:08	Nilles, Hannah 2025-08-07 MDL - PIP MP4 438:01 Q. And what it says is, "That is, safety incidents 438:02 follow patterns and have precursors that can be 438:03 leveraged to forecast them before they happen."	00:00:20	NH807_v4p-As-Pl ayedincourt1-21- 25.6

NH807_v4p-As-PlayedinCourt1-21-25 - Nilles, Hannah 08-07-25 v4p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
	438:04 Do you see that?		
	438:05 A. Yes, I see that.		
	438:06 Q. So that's what Uber is saying back in 2016 in this		
	438:07 document, right?		
	438:08 A. That's what this document says.		
438:21 - 439:03	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:25	NH807_v4p-As-Pl ayedincourt1-21- 25.7
	438:21 Q. And as one example of the patterns and precursors		
	438:22 that can be leveraged to forecast safety incidents,		
	438:23 this document says that "Safety incident rates		
	438:24 increase dramatically between 1:00 and 3:00 a.m.		
	438:25 and Saturday nights/Sunday mornings and on holidays		
	439:01 and other days of major social gatherings."		
	439:02 Do you see that?		
	439:03 A. Yes.		
439:10 - 439:14	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:16	NH807_v4p-As-Pl ayedincourt1-21- 25.8
	439:10 Q. And when did Uber disclose to the public its		
	439:11 understanding that rides taking place late at		
	439:12 night, on the weekends, or on days of major social		
	439:13 gatherings, that those rides had a higher risk of		
	439:14 safety incidents?		
439:17 - 439:17	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:03	NH807_v4p-As-Pl ayedincourt1-21- 25.9
	439:17 A. We have not made public disclosures.		
442:06 - 442:09	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:10	NH807_v4p-As-Pl ayedincourt1-21- 25.10
	442:06 Q. Ms. Nilles, Uber agrees that it's not just safety		
	442:07 incidents that have patterns and precursors.		
	442:08 Sexual assaults have patterns and precursors too,		
	442:09 right?		
442:11 - 442:11	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:03	NH807_v4p-As-Pl ayedincourt1-21- 25.11
	442:11 A. I mean, sexual assault is a safety incident.		
445:06 - 445:12	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:20	NH807_v4p-As-Pl ayedincourt1-21- 25.12
	445:06 Q. And do you see on the metadata that this is a		
	445:07 document that Uber produced to us that was created		
	445:08 on February 6, 2017?		

NH807_v4p-As-PlayedinCourt1-21-25 - Nilles, Hannah 08-07-25 v4p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
	445:09 A. Yes.		
	445:10 Q. And you see it identifies the title as "Preventing		
	445:11 Sexual Assaults," correct?		
	445:12 A. Yes.		
447:06 - 447:11	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:17	NH807_v4p-As-Pl ayedincourt1-21- 25.13
	447:06 Q. And what it lists as some of the correlates for		
	447:07 sexual assaults are, "Male offenders and female		
	447:08 victims," right?		
	447:09 A. That's what this says, yes.		
	447:10 Q. "Bars, plus late night, plus weekends," correct?		
	447:11 A. Yes.		
448:01 - 448:03	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:11	NH807_v4p-As-Pl ayedincourt1-21- 25.14
	448:01 Q. Okay. And have you seen where Uber has shared with		
	448:02 the public these correlates of sexual assaults that		
	448:03 are listed in this document?		
448:06 - 448:06	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:01	NH807_v4p-As-Pl ayedincourt1-21- 25.15
	448:06 A. No.		
461:21 - 462:15	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:48	NH807_v4p-As-Pl ayedincourt1-21- 25.16
	461:21 Q. Okay. And this is a document that you created,		
	461:22 correct?		
	461:23 A. Yes.		
	461:24 Q. And according to the metadata for this document,		
	461:25 you created it in December 2019.		
	462:01 Do you see that?		
	462:02 A. Yes.		
	462:03 Q. And it looks like there were modifications made to		
	462:04 it in March of 2020.		
	462:05 Do you see that?		
	462:06 A. Yes.		
	462:07 Q. And this is a document that was also found in the		
	462:08 custodial files of Greg Brown, Gus Fuldner, Roger		
	462:09 Kaiser, and Jenny Luu.		
	462:10 Do you see that?		
	462:11 A. Yes.		
	462:12 Q. And if we flip to the next page, it says, "Safety		
	462:13 Governance at Uber."		

NH807_v4p-As-PlayedinCourt1-21-25 - Nilles, Hannah 08-07-25 v4p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
	462:14 Do you see that?		
	462:15 A. Yes.		
462:22 - 462:25	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:11	NH807_v4p-As-Pl ayedincourt1-21- 25.17
	462:22 Q. And this document is something that you created for		
	462:23 a meeting that was held at Uber in March of 2020;		
	462:24 is that right?		
	462:25 A. Yes.		
464:25 - 465:02	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:05	NH807_v4p-As-Pl ayedincourt1-21- 25.18
	464:25 Q. And it talks about "Internal Interviews."		
	465:01 Do you see that?		
	465:02 A. Yes.		
471:12 - 471:22	Nilles, Hannah 2025-08-07 MDL - PIP MP4	00:00:28	NH807_v4p-As-Pl ayedincourt1-21- 25.19
	471:12 Q. And this slide includes quotes from the interviews		
	471:13 that you conducted, correct?		
	471:14 A. Yes.		
	471:15 Q. And the first quote is, "I will get fired if I		
	471:16 don't hit EBITDA. I'm not going to get fired if I		
	471:17 don't hit a safety KPI."		
	471:18 Do you see that?		
	471:19 A. Yes.		
	471:20 Q. Do you see where it says, "Stand For Safety is a		
	471:21 sham"?		
	471:22 A. Yes.		

<u>Our Designations</u>	<u>00:04:33</u>
TOTAL RUN TIME	00:04:33

Nilles, Hannah 08-07-25 Wave 1 v5p - As-Played in Court 01-21-25

Designation List Report



Nilles - Wave 1, Hannah

2025-08-07

Our Designations	00:08:20
Their Counters	00:04:40
TOTAL RUN TIME	00:13:00



NH807W1_v5p-As-PlayedinCourt1-21-25 - Nilles, Hannah 08-07-25 Wave 1 v5p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
299:01 - 299:04	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 299:01 Q. You are here to speak on Uber's behalf about its 299:02 screening and onboarding of Mr. Turay; is that 299:03 right? 299:04 A. Yes.	00:00:07	NH807W1_v5p-As-PlayedinCourt1-21-25.1
299:22 - 300:01	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 299:22 Q. Mr. Turay first applied to drive for Uber on 299:23 July 24, 2014; is that right? 299:24 A. I have got my paper copies, so I'm just going to 299:25 reference these to make sure we have the dates 300:01 correct.	00:00:16	NH807W1_v5p-As-PlayedinCourt1-21-25.2
300:03 - 300:05	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 300:03 That will be Exhibit 1853. (edited) 300:04 MARKED FOR IDENTIFICATION: 300:05 DEPOSITION EXHIBIT 1853	00:00:02	NH807W1_v5p-As-PlayedinCourt1-21-25.3
300:08 - 300:09	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 300:08 MARKED FOR IDENTIFICATION: 300:09 DEPOSITION EXHIBIT 1854	00:00:01	NH807W1_v5p-As-PlayedinCourt1-21-25.4
300:18 - 300:20	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 300:18 this is a copy of the status and flow logs for the 300:19 Hassan Turay account ending in AD49? 300:20 A. Yes.	00:00:17	NH807W1_v5p-As-PlayedinCourt1-21-25.5
302:11 - 302:17	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 302:11 Q. He was rejected from the peer-to-peer service on 302:12 August 18, 2014, right? 302:13 A. Yes. 302:14 Q. In your notes for your depo aid version of the flow 302:15 sheet, you say that that was due to insufficient 302:16 driving history; is that right? 302:17 A. Yes, that's right.	00:00:28	NH807W1_v5p-As-PlayedinCourt1-21-25.6
312:10 - 312:13	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 312:10 Q. Got it. Then 2016 a background check was conducted	00:00:12	NH807W1_v5p-As-PlayedinCourt1-21-25.7

NH807W1_v5p-As-PlayedinCourt1-21-25 - Nilles, Hannah 08-07-25 Wave 1 v5p - As-Played in Court 01-21-25

DESIGNATION	SOURCE	DURATION	ID
	312:11 which he failed for insufficient driving history, 312:12 right? 312:13 A. Yes.		
315:14 - 315:15	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 315:14 MARKED FOR IDENTIFICATION: 315:15 DEPOSITION EXHIBIT 1855	00:00:01	NH807W1_v5p-As-PlayedinCourt1-21-25.8
315:18 - 315:19	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 315:18 MARKED FOR IDENTIFICATION: 315:19 DEPOSITION EXHIBIT 1856	00:00:01	NH807W1_v5p-As-PlayedinCourt1-21-25.9
315:23 - 316:06	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 315:23 Q. It says report for Hassan Turay, suspended. This 315:24 is a background check that was conducted 315:25 December 7th, 2016, which is the date we just saw 316:01 that he had applied again. 316:02 A. Yes. 316:03 Q. And then if we look at Page 3 it says license 316:04 issued October 25, 2016. 316:05 Do you see that? 316:06 A. I see that, yes.	00:00:35	NH807W1_v5p-As-PlayedinCourt1-21-25.10
316:07 - 316:13	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 316:07 Q. So this was -- he failed this driver's -- driving 316:08 history check because his driver's license was 316:09 issued October 25, 2016, and he is applying 316:10 December of 2016, and that's less than a year, 316:11 right? 316:12 A. Yes. Then he goes back to Checkr and gives them a 316:13 new license.	00:00:25	NH807W1_v5p-As-PlayedinCourt1-21-25.11
317:02 - 317:05	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 317:02 Q. Is this the status and flow log for the other Turay 317:03 account, the one that started in 2016 and has an 317:04 UUID that starts with 7692? 317:05 A. Yes.	00:00:15	NH807W1_v5p-As-PlayedinCourt1-21-25.12
317:12 - 317:14	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 317:12 Q. Mr. Turay was activated as a peer-to-peer driver	00:00:11	NH807W1_v5p-As-PlayedinCourt1-

DESIGNATION	SOURCE	DURATION	ID
	317:13 for the first time on what date? 317:14 A. 12/23/2016.		
317:15 - 317:25	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 317:15 Q. We were just looking at a background check -- a 317:16 driving history check that he had failed in 317:17 December of 2016. What was it that caused him to 317:18 pass -- or to be activated after he had failed in 317:19 the background check? 317:20 A. He went back to Checkr and gave him -- gave them 317:21 his driver's license that showed a longer history. 317:22 Q. What are you basing that on? 317:23 A. My team looked in the Checkr portal and said that 317:24 he successfully confirmed their current or previous 317:25 driver's license on December 22, 2016, at 9:13 a.m.	00:00:43	NH807W1_v5p-As -PlayedinCourt1- 21-25.14
319:11 - 319:13	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 319:11 Exhibit 1857. 319:12 MARKED FOR IDENTIFICATION: 319:13 DEPOSITION EXHIBIT 1857	00:00:02	NH807W1_v5p-As -PlayedinCourt1- 21-25.15
319:17 - 319:18	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 319:17 Q. This is a report for Mr. Turay, you can see at the 319:18 top?	00:00:04	NH807W1_v5p-As -PlayedinCourt1- 21-25.16
319:22 - 320:01	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 319:22 Q. And this is a report, you can see at the bottom, 319:23 that was created December 19, 2016, completed 319:24 December 22, 2016. 319:25 Do you see that? 320:01 A. Yes.	00:00:11	NH807W1_v5p-As -PlayedinCourt1- 21-25.17
320:05 - 320:10	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 320:05 Q. The motor vehicle record section states that there 320:06 is a driver's license issue date of October 25, 320:07 2016, the same as we saw before. There's a first 320:08 issue date given of January 31st, 2008. 320:09 Do you see that? 320:10 A. Yes.	00:00:19	NH807W1_v5p-As -PlayedinCourt1- 21-25.18

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DESIGNATION	SOURCE	DURATION	ID
320:15 - 320:24	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 320:15 What is that based on, saying that 320:16 that's the first issue date? 320:17 A. That's what I told you. He would have communicated 320:18 directly with Checkr. I have no reason to believe 320:19 Checkr would have falsified this information. He 320:20 would have communicated with Checkr, provided his 320:21 true licensing history, and then they approved and 320:22 cleared the report and sent it to us, because he 320:23 was able to prove that he had longer licensing 320:24 histories.	00:00:21	NH807W1_v5p-As-PlayedinCourt1-21-25.19
320:25 - 321:08	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 320:25 Q. Does Uber allow Checkr to base licensing history on 321:01 any information other than actually being shown a 321:02 copy of a driver's license? 321:03 A. The licensing history, I believe, is actually done 321:04 through the motor vehicle -- through the DMV. I'm 321:05 not sure exactly what happened in this process, 321:06 again, because it would have been the consumer and 321:07 the consumer reporting agency. They get the actual 321:08 records from the DMV.	00:00:30	NH807W1_v5p-As-PlayedinCourt1-21-25.20
324:17 - 324:20	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 324:17 Q. Are you aware that Mr. Turay testified at 324:18 deposition under oath that he immigrated to the 324:19 United States in 2013? 324:20 A. I'm not aware, no.	00:00:09	NH807W1_v5p-As-PlayedinCourt1-21-25.21
325:09 - 325:10	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 325:09 Q. Do you think people can get driver's licenses in a 325:10 country they have not moved to yet?	00:00:04	NH807W1_v5p-As-PlayedinCourt1-21-25.22
325:12 - 325:12	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 325:12 A. I don't think I was insinuating that, no.	00:00:02	NH807W1_v5p-As-PlayedinCourt1-21-25.23
326:08 - 327:01	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 326:08 Q. Okay. Let's talk about Uber's what it calls 326:09 multilevel safety screening of Mr. Turay. The	00:01:09	NH807W1_v5p-As-PlayedinCourt1-21-25.24

DESIGNATION	SOURCE	DURATION	ID
	326:10 entirety of its screening process for Mr. Turay was		
	326:11 to get his Social Security, date of birth, and name		
	326:12 from him, to have him upload his driver's license,		
	326:13 registration, insurance, and profile photo, to		
	326:14 check his driving history and check his criminal		
	326:15 background, both of the latter pieces through		
	326:16 Checkr, right?		
	326:17 A. Yes.		
	326:18 Q. The driving history check that Uber did when it		
	326:19 onboarded him was done within the same -- it was		
	326:20 started and completed within the same minute,		
	326:21 right? That's Exhibit 1855, which we looked at.		
	326:22 A. Which one is that? Sorry. Let me finish this.		
	326:23 1855. You are talking about this insufficient		
	326:24 driving history one?		
	326:25 Q. Right.		
	327:01 A. Yes, it appears to be.		
327:05 - 327:12	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:19	NH807W1_v5p-As-PlayedinCourt1-21-25.25
	327:05 Q. The criminal background check was just focusing on		
	327:06 the criminal part of it, costs Uber between \$7 to		
	327:07 \$14, depending on whether they got a bulk rate for		
	327:08 it, right?		
	327:09 A. Yes.		
	327:10 Q. The whole screening process costs approximately		
	327:11 \$30, give or take, right?		
	327:12 A. Yes, that's correct.		
327:19 - 327:25	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:17	NH807W1_v5p-As-PlayedinCourt1-21-25.26
	327:19 Q. Uber did not conduct a criminal background check in		
	327:20 Sierra Leone, correct?		
	327:21 A. Correct.		
	327:22 Q. Did not conduct one in Guinea, right?		
	327:23 A. Correct.		
	327:24 Q. It did not conduct one in Ghana, right?		
	327:25 A. Right. We only conducted one in the United States.		
329:16 - 330:03	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:36	NH807W1_v5p-As-PlayedinCourt1-21-25.27
	329:16 Q. Isn't it important to Uber in onboarding Mr. Turay		
	329:17 to know whether he had ever committed rape, murder,		

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DESIGNATION	SOURCE	DURATION	ID
	329:18 or a serious violent crime in any country?		
	329:19 ATTORNEY PREMO-HOPKINS: Object to form.		
	329:20 A. That's incredibly difficult to ascertain and there		
	329:21 are wildly different standards for background		
	329:22 checks across the world and many places don't even		
	329:23 have them. In the case of Africa, specifically,		
	329:24 you have to go in person to obtain a physical		
	329:25 document, a police report that's, by the way,		
	330:01 easily falsified and would have to present it in		
	330:02 person, not digitally. It's not possible. No, we		
	330:03 don't do that.		
330:07 - 330:11	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:13	NH807W1_v5p-As-PlayedinCourt1-21-25.28
	330:07 Q. My question is, isn't it important to Uber when		
	330:08 it's onboarding or screening Mr. Turay to know		
	330:09 whether he had ever communicated rape or murder or		
	330:10 a serious violent crime in another country? Isn't		
	330:11 that something important to Uber?		
330:14 - 330:15	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:05	NH807W1_v5p-As-PlayedinCourt1-21-25.29
	330:14 A. I don't know if I can comment on what's important.		
	330:15 I can tell you what's feasible and realistic.		
331:04 - 331:07	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:11	NH807W1_v5p-As-PlayedinCourt1-21-25.30
	331:04 Q. Did Uber do anything to make up for the fact that		
	331:05 it couldn't check Mr. Turay's background in the		
	331:06 places -- other places he lived as an adult such as		
	331:07 doing psychometric testing?		
331:08 - 331:08	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:01	NH807W1_v5p-As-PlayedinCourt1-21-25.31
	331:08 A. No.		
331:16 - 332:01	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:30	NH807W1_v5p-As-PlayedinCourt1-21-25.32
	331:16 Q. Mr. Turay was born in 1974, right?		
	331:17 A. I don't have his driver's license in front of me.		
	331:18 Yes, I have his background check. Yes, I can see		
	331:19 that.		
	331:20 Q. That would mean by the time he was onboarded by		
	331:21 Uber in 2014, he was 42 years old, give or take,		
	331:22 right?		

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DESIGNATION	SOURCE	DURATION	ID
	331:23 A. Sure.		
	331:24 Q. So a background check that only looks at a few		
	331:25 years of his life would be missing the majority of		
	332:01 his adult life, right?		
332:03 - 332:03	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:01	NH807W1_v5p-As-PlayedinCourt1-21-25.33
	332:03 A. Yes, necessarily.		
332:25 - 333:04	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:10	NH807W1_v5p-As-PlayedinCourt1-21-25.34
	332:25 My question is: Did Uber feel that		
	333:01 onboarding a driver who had been living most of his		
	333:02 life outside the U.S. without checking his		
	333:03 background outside the U.S. was putting riders like		
	333:04 Ms. Dean in danger?		
333:06 - 333:11	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:12	NH807W1_v5p-As-PlayedinCourt1-21-25.35
	333:06 A. I don't think Uber, as a company, can feel. I'm		
	333:07 telling you what is operationally possible and what		
	333:08 was considered by the safety team.		
	333:09 BY ATTORNEY PETERS:		
	333:10 Q. Did Uber recognize that as a risk?		
	333:11 A. Yes.		
333:20 - 333:22	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:09	NH807W1_v5p-As-PlayedinCourt1-21-25.36
	333:20 Q. Did Uber ask Mr. Turay whether he had any criminal		
	333:21 background?		
	333:22 A. No.		
334:04 - 334:19	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:39	NH807W1_v5p-As-PlayedinCourt1-21-25.37
	334:04 A. Did we ask him to self-certify if he had a criminal		
	334:05 background, no.		
	334:06 Q. Did it ask for a list of prior employers?		
	334:07 A. No.		
	334:08 Q. Did it ask for any references at all?		
	334:09 A. No, we don't ask for references.		
	334:10 Q. Did it ask for a resume?		
	334:11 A. No.		
	334:12 Q. Did it ask for fingerprints?		
	334:13 A. No.		
	334:14 Q. Did it -- did Uber interview him in any way, shape,		

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DESIGNATION	SOURCE	DURATION	ID
	334:15 or form?		
	334:16 A. Not to my knowledge.		
	334:17 Q. Did it do any research of its own like Google or		
	334:18 social media?		
	334:19 A. No.		
335:24 - 336:01	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:09	NH807W1_v5p-As-PlayedinCourt1-21-25.38
	335:24 Q. Did the background check that Uber conducted in the		
	335:25 U.S. convince Uber that Mr. Turay would be a safe		
	336:01 driver?		
336:04 - 336:05	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:03	NH807W1_v5p-As-PlayedinCourt1-21-25.39
	336:04 A. I don't think you can ever be convinced that		
	336:05 someone is going to be safe.		
337:19 - 337:23	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:14	NH807W1_v5p-As-PlayedinCourt1-21-25.40
	337:19 Q. Did Uber flag Mr. Turay's account as being one that		
	337:20 represented extra risk based on the fact that its		
	337:21 screening consisted of a background check that was		
	337:22 conducted in a place where Mr. Turay had not lived		
	337:23 for very long?		
337:25 - 338:07	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:17	NH807W1_v5p-As-PlayedinCourt1-21-25.41
	337:25 A. Are you suggesting because he was an immigrant, we		
	338:01 should have flagged him for extra risk?		
	338:02 BY ATTORNEY PETERS:		
	338:03 Q. I'm not at all suggesting that.		
	338:04 Because Uber did not conduct a		
	338:05 background check in the place where he had actually		
	338:06 been living for most of his adult life, did Uber		
	338:07 flag him as extra risk?		
338:09 - 338:10	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:04	NH807W1_v5p-As-PlayedinCourt1-21-25.42
	338:09 A. I don't think there is data that would suggest that		
	338:10 immigrants are extra risky.		
338:21 - 338:23	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:06	NH807W1_v5p-As-PlayedinCourt1-21-25.43
	338:21 Q. Does the fact that Uber does not conduct a		
	338:22 background check in a place where a driver has		

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DESIGNATION	SOURCE	DURATION	ID
	338:23 lived make them risky?		
338:25 - 339:01	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 338:25 A. I don't have data to support that. But it's a 339:01 possible risk factor, yes.	00:00:04	NH807W1_v5p-As-PlayedinCourt1-21-25.44
467:25 - 468:06	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 467:25 Q. What's your understanding of the accuracy of 468:01 Checkr's background checks? 468:02 A. Checkr states publicly they have a 99.6 percent 468:03 accuracy rate, and they explain publicly how they 468:04 measure that as related to consumer complaints. 468:05 And they're an accredited background check 468:06 provider.	00:00:24	NH807W1_v5p-As-PlayedinCourt1-21-25.45
468:12 - 468:22	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 468:12 Q. Do you know how much money Uber invests in 468:13 background checks annually? 468:14 A. Over 300 million just in the United States alone. 468:15 Q. Does every person who wants to provide driving 468:16 services on the Uber platform have to undertake a 468:17 background check? 468:18 A. Yes. They have to undertake a background check at 468:19 the time they onboard. They undergo a background 468:20 check every year thereafter, and we have a 468:21 continuous monitoring product that's always looking 468:22 for arrests and convictions in real time.	00:00:27	NH807W1_v5p-As-PlayedinCourt1-21-25.46
469:12 - 470:07	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4 469:12 Q. And with regard to criminal background checks, how 469:13 are those records searched? 469:14 A. So there are what are called pointers, the user 469:15 provides their Social Security number, their name, 469:16 date of birth, and then Checkr conducts what's 469:17 called a Social Security number trace where they 469:18 look for any addresses of aliases that the person 469:19 has used in the past, and they also search the 469:20 national criminal database for any potential 469:21 records that could be related to this person but 469:22 may not be reportable.	00:00:59	NH807W1_v5p-As-PlayedinCourt1-21-25.47

DESIGNATION	SOURCE	DURATION	ID
	469:23 That then leads them to the validation		
	469:24 stage where if they find any potential records that		
	469:25 might relate to that person, they send -- in some		
	470:01 cases, they have to send a human to the courthouse		
	470:02 to validate that record and then validate it		
	470:03 against the name, date of birth, and personal		
	470:04 information of that person, and in some cases we're		
	470:05 able to do it immediately and electronically		
	470:06 depending on whether or not the courthouse has that		
	470:07 that available.		
473:03 - 473:12	Nilles - Wave 1, Hannah 2025-08-07 - PIP MP4	00:00:24	NH807W1_v5p-As -PlayedinCourt1- 21-25.48
	473:03 Q. Ms. Nilles, with regard to your work generally over		
	473:04 the past six years, how do you feel about your		
	473:05 team's work on background checks and		
	473:06 screening-related safety features?		
	473:07 A. I feel like we have a very strong and defensible		
	473:08 screening process.		
	473:09 And from what I have gathered attending		
	473:10 industry events and researching the background		
	473:11 check process, I feel that we have the best		
	473:12 available tools.		

Our Designations	00:08:20
Their Counters	00:04:40
TOTAL RUN TIME	00:13:00