

COURT EXHIBIT 5A

Designation Run Report for Elizabeth Ross
as played in Court 01/14-15/2026 (06-11-12-2025)

COURT EXHIBIT 2A

Designation Run Report for [Name]
as played in Court [date] ([deposition date])

COURT EXHIBIT 3A

Designation Run Report for [Name]
as played in Court [date] ([deposition date])

ROSS, ELIZABETH - v04p_As-Played in Court 01/14-15/2026

Designation List Report

		
Ross, Elizabeth		2025-06-11
Ross, Elizabeth		2025-06-11
Ross, Elizabeth		2025-06-12
Ross, Elizabeth		2025-06-12

PLF Affirmative	01:01:32
DEF Counter	00:11:58
TOTAL RUN TIME	01:13:29



RE_v4p - ROSS, ELIZABETH - v04p_ As-Played in Court 01/14-15/2026

DESIGNATION	SOURCE	DURATION	ID
16:06 - 16:10	Ross, Elizabeth 2025-06-11 - PIP MP4 16:06 Q. Good morning, Ms. Ross. 16:07 A. Good morning. 16:08 Q. Could you please full state your full 16:09 name for the record. 16:10 A. Yeah, it's Elizabeth O'Neil Ross.	00:00:06	RE_v4p.1
24:08 - 24:11	Ross, Elizabeth 2025-06-11 - WIT MP4 24:08 Q. Okay. And do you understand that the 24:09 testimony, the sworn testimony that you are giving 24:10 here today, is testimony on behalf of Uber? 24:11 A. Yes.	00:00:07	RE_v4p.2
36:24 - 37:01	Ross, Elizabeth 2025-06-11 - WIT MP4 36:24 Q. So let's go ahead, (edited) 36:25 then, and mark as Exhibit 1037 to your deposition 37:01 your LinkedIn profile.	00:00:06	RE_v4p.3
40:14 - 40:19	Ross, Elizabeth 2025-06-11 - WIT MP4 40:14 Q. Okay. Now, it looks like your current 40:15 position and your former position as global lead, 40:16 safety and sustainability, product marketing, is it 40:17 fair to say that one of the things that Uber is -- 40:18 one of the topics of Uber's marketing is safety? 40:19 A. Yes.	00:00:27	RE_v4p.4
41:02 - 41:20	Ross, Elizabeth 2025-06-11 - WIT MP4 41:02 Q. And you want to make people feel like 41:03 Uber's safe, right? 41:04 A. Yes. 41:05 Q. Okay. In fact, safety sentiment, that's 41:06 a concept you're familiar with, right? 41:07 A. Yes. 41:08 Q. And -- and the idea behind that is that 41:09 by "sentiment," we mean feeling, right? 41:10 A. Uh-huh. 41:11 Q. So the -- and you actually track and 41:12 measure how people feel about Uber and whether or 41:13 not it's safe, right? 41:14 A. Yes, we do. 41:15 Q. And you're trying to get that number 41:16 higher, right? 41:17 A. Yes.	00:00:41	RE_v4p.5

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DESIGNATION	SOURCE	DURATION	ID
	41:18 Q. And marketing plays a big role in trying 41:19 to get that safety sentiment number higher, right? 41:20 A. Yes.		
41:21 - 42:10	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:42	RE_v4p.6
	41:21 Q. And you've determined, through Uber's 41:22 perspective, the higher the safety sentiment number 41:23 is, the more strongly Uber performs as a business, 41:24 right? 41:25 A. I think what we hope is that anyone who 42:01 is using the platform or considering using the 42:02 platform can know and feel safe using it. And the 42:03 hope is that, yes, if people feel safe using the 42:04 product, they would potentially use it more 42:05 frequently because they've had a good experience. 42:06 Q. Yeah. 42:07 And, in fact, you need people to feel 42:08 safe about using Uber for people to use it, right? 42:09 A. Yes. That's the hope, that everyone 42:10 feels safe.		
42:11 - 42:14	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:13	RE_v4p.7
	42:11 Q. Okay. Because if you -- if a person -- a 42:12 women, for example, doesn't believe that Uber can 42:13 safely get her from point A to point B, she's 42:14 probably not going to choose to use Uber, right?		
42:16 - 42:18	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:06	RE_v4p.8
	42:16 THE DEPONENT: Yes. I -- I'm sure that 42:17 if anybody didn't feel safe using something, they 42:18 would avoid using it.		
63:25 - 64:12	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:37	RE_v4p.9
	63:25 Do you believe Uber has a (edited) 64:01 powerful brand? 64:02 A. I believe that Uber is a known brand, 64:03 yes. I don't know if I would use the word 64:04 "powerful," but I think it's a known -- well-known 64:05 brand around the world. 64:06 Q. Okay. And that brand is a brand that 64:07 cars -- that drivers who are -- who are driving for 64:08 Uber have to display on their car, correct? 64:09 A. From my understanding, yes.		

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DESIGNATION	SOURCE	DURATION	ID
	64:10 Q. Okay. And from a -- and branding is part 64:11 of marketing, right? 64:12 A. Yes, yeah.		
64:13 - 64:15	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:15	RE_v4p.10
	64:13 Q. And why does Uber, as part of its 64:14 marketing, have cars display that brand if they're 64:15 driving for Uber?		
64:18 - 64:20	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:10	RE_v4p.11
	64:18 THE DEPONENT: I think, just like you may 64:19 have mentioned before, to make sure that people can 64:20 see that it's part of the broader Uber platform.		
65:21 - 66:20	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:59	RE_v4p.12
	65:21 Q. And when that Uber sticker appears on an 65:22 Uber car, the hope is that that positive brand 65:23 sentiment will be attached to that car? 65:24 A. Yes. 65:25 Hopefully, yes. 66:01 Q. Okay. Which will make a passenger, such 66:02 as a woman, more likely to get into that car, 66:03 right? 66:04 A. I think maybe not -- that -- yes, that's 66:05 a specific scenario. 66:06 But, yes, the hope is that as people grow 66:07 to recognize and trust Uber, they would use the 66:08 product more and then, therefore, take trips like 66:09 that, yes. 66:10 Q. Okay. And take a particular trip to -- a 66:11 particular car that Uber sends to pick them up, 66:12 right? 66:13 A. Yes, yes. 66:14 Q. Okay. This branding and this marketing 66:15 that we've been talking about, this is an important 66:16 part of Uber's business, right? 66:17 A. Yes, I think so. 66:18 Q. Okay. And Uber spends a tremendous 66:19 amount of money on marketing and branding, right? 66:20 A. Yes, yes.		
94:25 - 95:17	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:31	RE_v4p.13
	94:25 Marketing can take (edited)		

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DESIGNATION	SOURCE	DURATION	ID
	95:01 different forms, right?		
	95:02 A. Yes.		
	95:03 Q. Okay. So there could be print ads, for		
	95:04 example?		
	95:05 A. Yes.		
	95:06 Q. That could appear in magazines, things of		
	95:07 that nature, right?		
	95:08 A. Yes.		
	95:09 Q. There could be ads on television?		
	95:10 A. Yeah.		
	95:11 Q. There could be social media.		
	95:12 That's a really important channel for		
	95:13 Uber's marketing, right?		
	95:14 A. Yes.		
	95:15 Q. And that includes Instagram, TikTok,		
	95:16 YouTube videos, correct?		
	95:17 A. Uh-huh, yeah.		
96:05 - 96:07	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:08	RE_v4p.14
	96:05 Q. From Uber's perspective, is that social		
	96:06 media channel an important way of marketing?		
	96:07 A. Yes, I think so.		
96:18 - 98:12	Ross, Elizabeth 2025-06-11 - PIP MP4	00:01:41	RE_v4p.15
	96:18 Q. And through social media marketing,		
	96:19 Uber's able to use, for example, algorithms to		
	96:20 determine the best way to market to particular		
	96:21 users, right?		
	96:22 A. I don't fully understand all the ins and		
	96:23 outs of like how the social marketing team does		
	96:24 that. But I know that there are ways, yes, that		
	96:25 you can target to specific audience.		
	97:01 Q. Okay. And you know that involves the use		
	97:02 of algorithms, right?		
	97:03 A. Yes, that's my understanding.		
	97:04 Q. Okay. And does Uber agree that that's a		
	97:05 particularly effective way of marketing?		
	97:06 A. I think it could be in some cases. Not		
	97:07 necessarily for everything.		
	97:08 Q. Elaborate.		
	97:09 A. There are some topics that you just want		
	97:10 the general public to know, where you don't		

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DESIGNATION	SOURCE	DURATION	ID
	97:11 necessarily have to be as targeted. And maybe		
	97:12 there are some other things where you are a little		
	97:13 bit more targeted in the way that you talk about		
	97:14 something. Or if it's a city-specific product or a		
	97:15 region-specific product, you can be more targeted		
	97:16 in that way, as well.		
	97:17 Q. Or you could be targeted based on		
	97:18 demographic --		
	97:19 A. You could.		
	97:20 Q. -- characteristics, right?		
	97:21 A. Yeah.		
	97:22 Q. So you could target marketing at women,		
	97:23 for example?		
	97:24 A. You can, yes.		
	97:25 Q. You could target marketing at women of		
	98:01 certain ages, correct?		
	98:02 A. Yes, I believe you can do that.		
	98:03 Q. Or if Uber was looking to increase its		
	98:04 gross bookings in a particular geographic region,		
	98:05 they could target marketing at that geographic		
	98:06 region, right?		
	98:07 A. Yes, from my understanding, you can do		
	98:08 that.		
	98:09 Q. Okay. And that's something that these		
	98:10 social media -- this social media marketing allows		
	98:11 in a way that other marketing channels don't,		
	98:12 right?		
98:14 - 98:14	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:01	RE_v4p.16
	98:14 THE DEPONENT: Yes, it can.		
106:21 - 106:24	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:03	RE_v4p.17
	106:21 make this 1043. (edited)		
	106:22 (Exhibit 1043 was marked for		
	106:23 identification by the Court Reporter and is		
	106:24 attached hereto.)		
107:11 - 107:17	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:13	RE_v4p.18
	107:11 Q. Okay. And the date it has is March 13th,		
	107:12 2018, right?		
	107:13 A. Yes.		
	107:14 Q. Okay. If you scroll forward, the title		
	107:15 of this PowerPoint is "Global Safety Brand		

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DESIGNATION	SOURCE	DURATION	ID
	107:16 Perception," right?		
	107:17 A. Yes.		
111:04 - 111:17	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:35	RE_v4p.19
	111:04 Q. Okay. The next slide says, "Weave safety		
	111:05 throughout lifecycle communications."		
	111:06 Do you see that?		
	111:07 A. I do.		
	111:08 Q. And is that a reference to Uber's wanting		
	111:09 folks in marketing, as part of a best practice, to		
	111:10 repeatedly mention safety?		
	111:11 A. Yes.		
	111:12 From my understanding, when we refer to		
	111:13 lifecycle communications, it means the		
	111:14 communications you might receive over the lifetime		
	111:15 of being a user. So making sure that safety is		
	111:16 coming up throughout different touchpoints whenever		
	111:17 it makes the most sense.		
128:16 - 128:17	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:03	RE_v4p.20
	128:16 And we're going to mark this as		
	128:17 Exhibit 1045.		
131:01 - 131:15	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:32	RE_v4p.21
	131:01 Q. Uber would agree that the vast (edited)		
	131:02 majority of people ordering Uber rides are ordering		
	131:03 the rides through Uber's app, correct?		
	131:04 A. Yes, I believe so.		
	131:05 Q. And that would require looking at the		
	131:06 app, right?		
	131:07 A. Yes. Ideally, yes.		
	131:08 Q. And when you're obtaining the app, the		
	131:09 first thing you have to do is go to the App Store,		
	131:10 right?		
	131:11 A. Yes.		
	131:12 Q. And am I right that there is marketing		
	131:13 messaging and branding messaging that Uber includes		
	131:14 in its App Store listing?		
	131:15 A. Yes.		
143:04 - 144:06	Ross, Elizabeth 2025-06-11 - WIT MP4	00:01:23	RE_v4p.22
	143:04 Q. And these are the App Store (edited)		
	143:05 screenshots in 2024, right?		

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DESIGNATION	SOURCE	DURATION	ID
143:06	A. Yes, that's what it looks like.		
143:07	Q. December 10th.		
143:08	A. Yes.		
143:09	Q. Okay. And if we look -- so anyone who		
143:10	was going to look -- download the Uber app or		
143:11	maybe, you know, reload it on a new Apple device		
143:12	would have seen -- would have seen these materials,		
143:13	right?		
143:14	A. Yes, they could scroll down in the app		
143:15	store and see this beneath our app icon and where		
143:16	they could either download it or update their app.		
143:17	Q. Okay. And if you look all -- on the top		
143:18	row, all the way on the right, do you see where it		
143:19	says, "Ride safely with Uber"?		
143:20	A. I do.		
143:21	Q. Okay. From Uber's perspective, is the		
143:22	purpose of saying "Ride safely with Uber" to		
143:23	communicate to someone considering using Uber that		
143:24	Uber can give you a safe ride?		
143:25	A. Yeah, I mean, this App Store is		
144:01	ultimately touching on important things we want to		
144:02	communicate to users before they download the app,		
144:03	as they update the app, so that they know a little		
144:04	bit more about the platform.		
144:05	And safety is one of those things, so		
144:06	this screen is talking about that, yes.		
145:23 - 146:25	Ross, Elizabeth 2025-06-11 - WIT MP4	00:01:43	RE_v4p.23
145:23	Q. Okay. But on that App Store, they		
145:24	wouldn't receive any information about the		
145:25	prevalence of sexual assault that occurs during		
146:01	Uber Rides, right?		
146:02	A. No, it does not say that.		
146:03	Q. And they wouldn't receive any information		
146:04	about the times of day when the risk of sexual		
146:05	assault is -- is higher, like at night, right?		
146:06	A. No, the App -- App Store does not say		
146:07	that.		
146:08	Q. The App Store wouldn't tell a woman		
146:09	considering whether or not to use Uber to ride that		
146:10	the prevalence of sexual assault is higher where		

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DESIGNATION	SOURCE	DURATION	ID
	146:11 there's -- where -- where a person orders a ride		
	146:12 from somewhere near a bar or a nightclub, right?		
	146:13 A. The App Store does not say that, no.		
	146:14 Q. Okay. So a person who is considering		
	146:15 whether or not -- a woman who is considering		
	146:16 whether or not to use Uber and to rely on Uber to		
	146:17 get from point A to point B, they are going to see		
	146:18 "Ride safely with Uber," but not any of that other		
	146:19 information we just talked about, right?		
	146:20 A. In the App Store, they will not see that.		
	146:21 But anybody can go onto our website and see our		
	146:22 safety reports that we have, where we do talk about		
	146:23 some of those specific topics. So anyone who is		
	146:24 using a product can do their own research to learn		
	146:25 more about the experience that they should expect.		
147:01 - 147:09	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:21	RE_v4p.24
	147:01 Our website talks about how to use the		
	147:02 product. It talks about our safety features. It		
	147:03 talks about all of that if you're a prospective		
	147:04 rider, which means like we aren't able to		
	147:05 communicate directly to you through email, like I		
	147:06 mentioned before.		
	147:07 But before using any product, I think a		
	147:08 lot of people, including myself, will do my own		
	147:09 research beyond just one space.		
149:05 - 149:07	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:17	RE_v4p.25
	149:05 Q. Okay. And you understand that Uber made		
	149:06 efforts to minimize how much press and public		
	149:07 attention those safety reports got, right?		
149:14 - 149:14	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:01	RE_v4p.26
	149:14 THE DEPONENT: I'm not aware of that.		
151:17 - 151:20	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:02	RE_v4p.27
	151:17 MS. WALSH: 1046, please.		
	151:18 (Exhibit 1046 was marked for		
	151:19 identification by the Court Reporter and is		
	151:20 attached hereto.)		
151:25 - 152:10	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:20	RE_v4p.28
	151:25 Q. (By Ms. Walsh) Okay. So if we look --		
	152:01 we can see there's an email about a third down the		

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DESIGNATION	SOURCE	DURATION	ID
	152:02 page from Jill Hazelbaker.		
	152:03 Do you see that, Ms. Ross?		
	152:04 A. I do, yes.		
	152:05 Q. Sent on April 12th, 2019, right?		
	152:06 A. Yes.		
	152:07 Q. And the subject is "Transparency		
	152:08 Reports/Safety Campaign."		
	152:09 Do you see that?		
	152:10 A. I do, yes.		
163:22 - 163:22	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:03	RE_v4p.29
	163:22 Q. Let's look at the next page of (edited)		
163:23 - 165:24	Ross, Elizabeth 2025-06-11 - PIP MP4	00:01:54	RE_v4p.30
	163:23 this email where Jill Hazelbaker -- who's the head		
	163:24 of communications, right?		
	163:25 A. Yes, communications.		
	164:01 Q. She's on the executive leadership team,		
	164:02 right?		
	164:03 A. Yes.		
	164:04 Q. Very high up in the company, right?		
	164:05 A. Yes.		
	164:06 Q. And she's writing to other folks who are		
	164:07 really high in the company, including Gus Fuldner,		
	164:08 right?		
	164:09 A. Yes.		
	164:10 Q. Tony West, right?		
	164:11 A. Yes.		
	164:12 Q. And she says, "Separately, I want to		
	164:13 ensure that we are all aligned that this launch		
	164:14 should not be a consumer moment."		
	164:15 Do you see that?		
	164:16 A. I do.		
	164:17 Q. "While our day-of plan will naturally		
	164:18 include things like a landing page and a social		
	164:19 strategy, my strong view is that we want to manage		
	164:20 consumer attention, not invite it."		
	164:21 Do you see that?		
	164:22 A. I do.		
	164:23 Q. So Uber had no interest in inviting		
	164:24 consumers to pay attention to this safety report,		
	164:25 right?		

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DESIGNATION	SOURCE	DURATION	ID
165:01	A. I think that's how it is framed here		
165:02	where they talk about the fact that we are not		
165:03	having a large campaign around this. That's true.		
165:04	Q. And not wanting it to be a consumer		
165:05	moment, right?		
165:06	A. Yes, that's what it says.		
165:07	Q. Not wanting to invite consumer attention		
165:08	to the safety report, right?		
165:09	A. Yes, that's what it says.		
165:10	Q. And it goes on to say, "On the PR side,		
165:11	our goal will be to shut down the press cycle in 24		
165:12	to 48 hours for a whole host of reasons," right?		
165:13	A. Yes, that's what it says.		
165:14	Q. It says, "not least of which is that our		
165:15	focus group research shows that gut reactions about		
165:16	safety are negative, and consumers' immediate		
165:17	response is likely to assume the report means that		
165:18	Uber has more issues than its competitors."		
165:19	Do you see that?		
165:20	A. I do, yeah.		
165:21	Q. Okay. So in addition to not making it a		
165:22	consumer moment, managing consumer attention,		
165:23	Ms. Hazelbaker here is saying that she wants to		
165:24	shut down the press cycle --		
166:01 - 166:02	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:04	RE_v4p.31
166:01	Q. (By Ms. Walsh) -- regarding this report		
166:02	within 24 to 48 hours, right?		
166:06 - 166:07	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:02	RE_v4p.32
166:06	THE DEPONENT: Yes, that's what it says		
166:07	here.		
175:10 - 175:11	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:10	RE_v4p.33
175:10	Let me show you AW56 which we're going to		
175:11	mark as Exhibit 1048 your deposition.		
176:07 - 176:12	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:12	RE_v4p.34
176:07	Q. So take a look at this document (edited)		
176:08	now, which is called, "2019 Planning/Roadmap		
176:09	Proposal, United States and Canada Safety		
176:10	Operations."		
176:11	Do you see that?		

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	176:12 A. Yes, I do.		
181:07 - 183:16	Ross, Elizabeth 2025-06-11 - PIP MP4	00:02:00	RE_v4p.35
	181:07 says, "Our customers face devastating experiences		
	181:08 every day on the Uber platform."		
	181:09 Do you see that?		
	181:10 A. I do.		
	181:11 Q. It says -- it references "External		
	181:12 Headlines."		
	181:13 And these are things that are being		
	181:14 reported in the news at this time, right?		
	181:15 A. Yes.		
	181:16 Q. "Woman sexually assaulted by Uber driver,		
	181:17 police say," right?		
	181:18 A. Yes.		
	181:19 Q. "CNN investigation: 103 Uber drivers		
	181:20 accused of sexual assault or abuse."		
	181:21 Do you see that?		
	181:22 A. I do.		
	181:23 Q. "Madison woman says she was sexually		
	181:24 assaulted, battered by Uber driver, police say."		
	181:25 Do you see that?		
	182:01 A. Yes.		
	182:02 Q. This is something being reported by the		
	182:03 police?		
	182:04 A. Yes, it looks like that.		
	182:05 Q. It talks about, the final two headlines,		
	182:06 two Uber drivers unfortunately losing their lives,		
	182:07 right?		
	182:08 A. Yes, it looks like that.		
	182:09 Q. Okay. And then in the next column, it		
	182:10 says, "2018 Rider and Driver Impact."		
	182:11 Do you see that?		
	182:12 A. I do.		
	182:13 Q. And there, it's actually quantifying in		
	182:14 this PowerPoint the devastating experiences that		
	182:15 Uber's customers have every day on the Uber		
	182:16 platform, right?		
	182:17 A. Yes.		
	182:18 I believe this is tying this to year to		
	182:19 date, so over the course of the year.		

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	182:20 Q. Okay. So the year isn't over, and the		
	182:21 numbers are already this high?		
	182:22 A. It looks like so far, yes.		
	182:23 Q. Okay. And it says, "4.7 thousand Serious		
	182:24 Accidents Year to Date," right?		
	182:25 A. Yes.		
	183:01 Q. "13,000 Riders and Drivers Involved in		
	183:02 Serious Interpersonal Conflicts."		
	183:03 Do you see that?		
	183:04 A. I do.		
	183:05 Q. And there's a little footnote there,		
	183:06 right?		
	183:07 A. Yes.		
	183:08 Q. And the footnote says, in reference to		
	183:09 serious interpersonal conflicts, "includes sexual		
	183:10 assault and serious sexual misconduct," right?		
	183:11 A. Yes.		
	183:12 Q. "Physical altercations and thefts with		
	183:13 injuries," right?		
	183:14 A. Yes.		
	183:15 Q. And "physical stalking," right?		
	183:16 A. Yes.		
183:20 - 184:01	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:26	RE_v4p.36
	183:20 Q. Okay. And you agree that those are all		
	183:21 serious -- serious harms that can and, according to		
	183:22 this document, were reported by people using the		
	183:23 Uber app, right?		
	183:24 A. It looks like from this document, yes.		
	183:25 Those are serious incidents that people have		
	184:01 reported through JIRA tickets, yes.		
187:24 - 188:08	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:25	RE_v4p.37
	187:24 Q. (By Ms. Walsh) Here in the executive		
	187:25 summary of the safety report, the bolded sentence		
	188:01 that you all chose to include and communicate is		
	188:02 that "The vast majority of Uber trips end without		
	188:03 any safety-related issue at all," right?		
	188:04 A. Yes.		
	188:05 Q. Internally, you're discussing the fact		
	188:06 that "Our customers face devastating experiences		
	188:07 every day on the Uber platform," right?		

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DESIGNATION	SOURCE	DURATION	ID
	188:08 A. Yes, that's what this slide says.		
188:20 - 188:24	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:17	RE_v4p.38
	188:20 Q. And disclosing to consumers outside the		
	188:21 company that folks using Uber "face devastating		
	188:22 experiences every day on the Uber platform" would		
	188:23 be -- is inconsistent with trying to get people to		
	188:24 trust in the safety of Uber, right?		
189:02 - 189:13	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:37	RE_v4p.39
	189:02 THE DEPONENT: I think the transparency		
	189:03 report is doing -- or the safety report is us		
	189:04 taking a step in the direction that I, again, am		
	189:05 extremely proud of the company for doing, which is		
	189:06 making sure people are aware of what happens on the		
	189:07 platform and that there is risk associated to that.		
	189:08 And I think that with all of the trips		
	189:09 that happen on our platform every single day, there		
	189:10 is an extremely rare instance that these happen.		
	189:11 And that is why we included this information and		
	189:12 these stats in each of the safety reports that we		
	189:13 have.		
198:24 - 198:25	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:03	RE_v4p.40
	198:24 MS. WALSH: And we're going to mark this		
	198:25 as Exhibit 1050, please.		
199:12 - 200:04	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:42	RE_v4p.41
	199:12 Q. (By Ms. Walsh) Okay. If you turn with		
	199:13 me to -- this is the United States and Canada		
	199:14 Central Ops Personal Safety 2020 Opportunity		
	199:15 Analysis.		
	199:16 Do you see that?		
	199:17 A. Yes.		
	199:18 Q. And this is as of October 2019, right?		
	199:19 A. Yes, it looks like it.		
	199:20 Q. Okay. And if you look at the very next		
	199:21 page, it says "United States and Canada 2020		
	199:22 Personal Safety Insights Executive Summary."		
	199:23 Do you see that?		
	199:24 A. Yes. Sorry.		
	199:25 Q. Okay. And under "Analysis/Key Findings,"		
	200:01 it says, "Serious IPC rate Historical Trends and by		

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DESIGNATION	SOURCE	DURATION	ID
	200:02 incident type."		
	200:03 Do you see that?		
	200:04 A. Yes.		
200:05 - 200:06	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:06	RE_v4p.42
	200:05 Q. And "IPC" stands for what?		
	200:06 A. Interpersonal conflict.		
200:07 - 200:15	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:32	RE_v4p.43
	200:07 Q. And if you look at the next page, (edited)		
	200:08 row 3, it says, "Who - safety equality & user		
	200:09 profile," right?		
	200:10 A. Yes.		
	200:11 Q. And the objective is, "Identify which		
	200:12 user cohorts/demographics have higher incident		
	200:13 rates."		
	200:14 Do you see that?		
	200:15 A. I do.		
204:04 - 204:15	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:35	RE_v4p.44
	204:04 Q. Okay. And then it says "4.2 By AM/PM and		
	204:05 day of the week: Increasing number of incidents		
	204:06 are observed at night times and weekend."		
	204:07 Do you see that?		
	204:08 A. I do.		
	204:09 Q. Okay. Is that something that in Uber's		
	204:10 marketing, you all make sure to disclose to people,		
	204:11 like, look, the rate of safety incidents is low but		
	204:12 you should know it's greater if you're taking Uber		
	204:13 at night or on the weekend?		
	204:14 A. As far as I'm aware, I don't believe we		
	204:15 have explicitly said that, no.		
204:23 - 205:05	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:18	RE_v4p.45
	204:23 Q. So it says, "On average, 60 (edited)		
	204:24 serious incidents happen in the United States and		
	204:25 Canada per day, the majority of which are sexual		
	205:01 assault/serious sexual misconduct."		
	205:02 Do you see that?		
	205:03 A. Yes, I do.		
	205:04 Q. If you look on the next -- the next		
	205:05 page I want to show you, page 14 of the PDF that		
205:06 - 205:06	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:05	RE_v4p.46

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DESIGNATION	SOURCE	DURATION	ID
	205:06 begins with "Female users."		RE_v4p.46
205:07 - 206:09	Ross, Elizabeth 2025-06-11 - PIP MP4	00:01:04	RE_v4p.47
	205:07 A. Okay.		
	205:08 Q. Okay. It says, "Female users are exposed		
	205:09 to a higher rate of serious incidents than male		
	205:10 users."		
	205:11 Do you see that?		
	205:12 A. I do, yes.		
	205:13 Q. In gathering together all of the		
	205:14 information that you did from the App Stores and		
	205:15 the app itself, did you see anywhere where Uber		
	205:16 makes sure that women who are deciding whether or		
	205:17 not to use Uber understand that they're at a higher		
	205:18 rate of suffering a serious safety incident than --		
	205:19 than men are?		
	205:20 A. No, we do not say that in the App Store		
	205:21 or app.		
	205:22 Q. Okay.		
	205:23 A. I do just want to note too that within		
	205:24 the app and the App Store, we're not able to		
	205:25 determine gender of who is looking at the App Store		
	206:01 or the app itself, so --		
	206:02 Q. Okay.		
	206:03 A. -- it's not possible for us to		
	206:04 necessarily do that.		
	206:05 Q. Well, you could share that information		
	206:06 with all people looking at the Uber app, right?		
	206:07 A. We could, yes.		
	206:08 Q. But you don't?		
	206:09 A. Not today, no.		
206:10 - 208:05	Ross, Elizabeth 2025-06-11 - PIP MP4	00:02:00	RE_v4p.48
	206:10 Q. Okay. Have you in the past?		
	206:11 A. No, not that I know of. But, again, I		
	206:12 think similar to my response before, there are		
	206:13 other places on our website where we do talk about		
	206:14 some of these things that people can go to to learn		
	206:15 more.		
	206:16 Q. No one needs to look at Uber's website in		
	206:17 order to use Uber, right?		
	206:18 A. No.		

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DESIGNATION	SOURCE	DURATION	ID
206:19	Q. The only place that you have -- well, if		
206:20	some -- for those people who are using the app,		
206:21	right -- and I think we decided earlier that most		
206:22	people who use Uber use the app to --		
206:23	A. Yes.		
206:24	Q. -- get Uber Rides, right?		
206:25	A. Generally, yes.		
207:01	Q. So if there was something you wanted to		
207:02	make sure that people deciding whether to use Uber,		
207:03	if there was something you wanted to make sure that		
207:04	they knew, like information they -- like, you		
207:05	wanted to make sure they had so that they could		
207:06	make their own informed, like, good decision about		
207:07	whether they felt okay using Uber, the good place		
207:08	to put it would be in the App Store, right?		
207:09	A. I'm not sure I agree with that.		
207:10	I think some people read the App Store		
207:11	and some people do not. I don't know how many		
207:12	times you go in and download an app and read the		
207:13	full description of what the app is. The hope is		
207:14	that that happens and that there is comprehension		
207:15	around what the -- the platform does or the product		
207:16	does.		
207:17	But I think knowing that there is not a		
207:18	mandatory that people are reading our App Store		
207:19	before they can download and use the app, we just		
207:20	try and make sure that we are using a lot of		
207:21	different touchpoints to educate on our different		
207:22	products and offerings.		
207:23	And the website is one of them where we		
207:24	have longer form to give more context on things,		
207:25	where the App Store has limitations and character		
208:01	counts. And so knowing that the website is a		
208:02	surface where people can go to learn more, that is		
208:03	where we have more things like a safety report or		
208:04	Web pages that talk about every one of our safety		
208:05	features for people to educate themselves.		
211:16 - 212:09	Ross, Elizabeth 2025-06-11 - PIP MP4	00:01:02	RE_v4p.49
211:16	Q. Okay. You don't share the fact that your		
211:17	internal data show that your risk of being		

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DESIGNATION	SOURCE	DURATION	ID
	211:18 assaulted is actually higher if you take Uber at 211:19 night than if you take it during the day? 211:20 A. We do not say that. And I know we're 211:21 talking about Uber today, but just to put it into a 211:22 little bit more context, and I bet if we overlaid 211:23 this graph with one around bus, subway, any other 211:24 transportation, the numbers would be similar where 211:25 they rise in the wee hours because -- and just 212:01 generally with crime, you see that there's an 212:02 increase at night. 212:03 And there's a general risk when you are 212:04 traveling at night, and that is something that I 212:05 think as people start to experience things in the 212:06 world and move around their cities and start to 212:07 understand their comfort level and which 212:08 transportation option they want to choose, that 212:09 risk is known and learned and -- yeah.		
217:05 - 217:08	Ross, Elizabeth 2025-06-11 - PIP MP4 217:05 Q. Do you agree with me that from early on, 217:06 Uber's mission was to establish universal trust in 217:07 Uber as the safest place in every city? 217:08 A. No, I don't agree with that.	00:00:09	RE_v4p.50
225:08 - 225:14	Ross, Elizabeth 2025-06-11 - WIT MP4 225:08 MS. WALSH: Let's look at what we're 225:09 going to mark as -- 225:10 MR. REDE: 1052, AW3. 225:11 MS. WALSH: 1052, AW3. 225:12 (Exhibit 1052 was marked for 225:13 identification by the Court Reporter and is 225:14 attached hereto.)	00:00:08	RE_v4p.51
226:04 - 226:07	Ross, Elizabeth 2025-06-11 - PIP MP4 226:04 Q. Okay. Okay. We see that this document 226:05 is "Safety Experience 2016 Overview." 226:06 Do you see that? 226:07 A. Yes, I do.	00:00:08	RE_v4p.52
230:02 - 230:05	Ross, Elizabeth 2025-06-11 - PIP MP4 230:02 Q. So on the next page, what we see (edited) 230:03 is, again, this concept, "Establish universal trust 230:04 in Uber as the safest place in every city," right?	00:00:16	RE_v4p.53

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DESIGNATION	SOURCE	DURATION	ID
	230:05 A. Yes.		
230:09 - 230:23	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:46	RE_v4p.54
	230:09 Q. And it says, "We have to ensure people		
	230:10 trust us with their safety too," right?		
	230:11 A. Yes.		
	230:12 Q. And that is part of the -- what the		
	230:13 marketing function aimed so much of its resources		
	230:14 and budget and effort at, correct?		
	230:15 A. Yes, I think that it was -- we were		
	230:16 trying to build trust and understanding of safety		
	230:17 for users, yes.		
	230:18 Q. Because without trust, without people		
	230:19 trusting Uber with their safety, people aren't		
	230:20 going to use Uber, right?		
	230:21 A. No, I don't think they would.		
	230:22 If you don't feel safe using a product,		
	230:23 you will probably stop using it.		
245:02 - 245:03	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:02	RE_v4p.55
	245:02 Q. This is going (edited)		
	245:03 to be Exhibit --		
245:05 - 245:05	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:01	RE_v4p.56
	245:05 MS. WALSH: -- 1053.		
246:08 - 246:12	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:08	RE_v4p.57
	246:08 Q. (By Ms. Walsh) Okay. Ms. Ross, do you		
	246:09 have in front of you a document entitled, "U.S.		
	246:10 Prospective Riders Quantitative."		
	246:11 Do you see that?		
	246:12 A. I do.		
249:24 - 250:15	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:48	RE_v4p.58
	249:24 Q. And if we look at the next slide, we		
	249:25 actually see a picture of -- of a man and a woman,		
	250:01 and we see this younger woman. And what it says is		
	250:02 "Safety Impact Acquisition," right?		
	250:03 A. Yes.		
	250:04 Q. And what that is talking about is the		
	250:05 acquisition of women like this as customers for		
	250:06 Uber Rides, right?		
	250:07 A. It could imply that, yes.		
	250:08 Q. Okay. It says, "Over half of prospects		

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DESIGNATION	SOURCE	DURATION	ID
	250:09 have a safety concern that may impact their 250:10 willingness to use rideshare. Sexual 250:11 assaults/harassment is a top concern for female 250:12 prospect riders," right? 250:13 A. Yes. 250:14 Q. And that's understandable, isn't it? 250:15 A. Yes, it is.		
256:25 - 257:03	Ross, Elizabeth 2025-06-11 - WIT MP4 256:25 MS. WALSH: -- 1054. 257:01 (Exhibit 1054 was marked for 257:02 identification by the Court Reporter and is 257:03 attached hereto.)	00:00:02	RE_v4p.59
257:05 - 257:13	Ross, Elizabeth 2025-06-11 - PIP MP4 257:05 Q. (By Ms. Walsh) Okay. And this is a 257:06 document, if you -- from 2021, right? 257:07 A. Yes. 257:08 Q. And it deals with Uber mobility, correct? 257:09 A. Yes, that's what it looks like. 257:10 Q. And, again, mobility includes 257:11 rideshare -- 257:12 A. Yes. 257:13 Q. -- right?	00:00:22	RE_v4p.60
258:11 - 259:12	Ross, Elizabeth 2025-06-11 - WIT MP4 258:11 Q. And if we go to the next slide, we can 258:12 see that, "In A Highly Competitive Market, Safety 258:13 Is A Differentiating Factor," right? 258:14 A. Yes. 258:15 Q. And this is a reference to the fact that 258:16 in order for Uber to compete effectively with 258:17 companies like Lyft, it had to work on its safety 258:18 image, right? 258:19 A. That's what this looks like it's 258:20 explaining, yes. 258:21 Q. Okay. Because it's indicating here 258:22 Uber's previous problems with safety, right? 258:23 A. Yeah, it looks like it's taken a few 258:24 headlines. 258:25 Q. Okay. And -- well, the Uber folks who 259:01 made this PowerPoint took these headlines, right? 259:02 A. Yes, whoever made this deck built these.	00:01:13	RE_v4p.61

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DESIGNATION	SOURCE	DURATION	ID
	259:03 Q. And, for example, it has		
	259:04 "The New York Times, Uber Says 3,045 Sexual		
	259:05 Assaults Were Reported in U.S. Rides Last Year,"		
	259:06 right?		
	259:07 A. Yes, it says that.		
	259:08 Q. Business Insider reports "Uber Sued for		
	259:09 Allegedly Failing to Prevent Woman's Sexual		
	259:10 Assault."		
	259:11 Do you see that?		
	259:12 A. I do.		
259:16 - 260:03	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:27	RE_v4p.62
	259:16 Q. Okay. NPR reports "Uber Received Nearly		
	259:17 6,000 U.S. Sexual Assault Claims In The Past		
	259:18 2 Years."		
	259:19 Do you see that?		
	259:20 A. I do.		
	259:21 Q. And then it's got a report from -- some		
	259:22 similar issues in Brazil and also from -- in India,		
	259:23 right?		
	259:24 A. Yes.		
	259:25 Q. And underneath that, what Uber says is		
	260:01 "Today, Uber does not equal safety."		
	260:02 Do you see that?		
	260:03 A. Yes, I do.		
261:02 - 261:18	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:46	RE_v4p.63
	261:02 Q. Okay. So this was having a negative		
	261:03 effect on Uber's business, right?		
	261:04 A. Yes, I would assume so, if people are		
	261:05 reading negative press, yeah.		
	261:06 Q. Okay. Well, and if these assaults are		
	261:07 happening, right?		
	261:08 A. Yes.		
	261:09 Q. And if it's affecting whether or not		
	261:10 women feel safe enough to get into a car that Uber		
	261:11 sends to them, right?		
	261:12 A. Yeah.		
	261:13 Q. Uber needs those women who it's sending		
	261:14 cars to to feel safe getting into that car, right?		
	261:15 A. Yes.		
	261:16 Ideally, they feel safe before they		

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DESIGNATION	SOURCE	DURATION	ID
	261:17 actually use the product or when they're using the 261:18 product.		
262:04 - 262:16	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:45	RE_v4p.64
	262:04 Okay. So if we look at the next slide, 262:05 the conclusion of this is "Uber Must Be Synonymous 262:06 With Safety To Win Female Consumers," right? 262:07 A. Yes, that's what it says. 262:08 Q. Okay. And the idea, recognizing that, 262:09 that "Uber Must Be Synonymous With Safety To Win 262:10 Female Consumers," if you look at the next slide, 262:11 what this deck is doing is "Introducing Uber's Next 262:12 Global Campaign." 262:13 Do you see that? 262:14 A. Yes, I do. 262:15 Q. And it says "Your Safety Matters," right? 262:16 A. Yes.		
266:07 - 266:25	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:59	RE_v4p.65
	266:07 Q. Well, just in general. I mean, Uber is 266:08 interested in bringing -- getting more women using 266:09 Uber more frequently, regardless of whether they're 266:10 Latinx or not, regardless -- I mean, it's 266:11 interested in women, women, women, right? 266:12 A. I'm not sure I agree with them targeting 266:13 women very specifically and saying that they are 266:14 the main audience that we're trying to acquire 266:15 overall. 266:16 I know that we, as a company, always 266:17 continue to build the number of users using our 266:18 platform and products, and we don't target to 266:19 specific audiences or genders for every single 266:20 campaign. 266:21 So for a lot of acquisition campaigns, we 266:22 target across all demographics and all genders. 266:23 And a lot of the work that I personally do on the 266:24 safety product marketing team does not target by 266:25 gender at all.		
267:01 - 267:18	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:41	RE_v4p.66
	267:01 Q. Okay. But a priority for Uber in its 267:02 marketing has certainly been getting more women 267:03 using, taking Uber rides, right?		

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DESIGNATION	SOURCE	DURATION	ID
267:04	A. Yeah, from some past campaigns, it does		
267:05	look there -- look like there are targeted		
267:06	campaigns specific to women, yes. But I can't say		
267:07	that it's the No. 1 audience that we're always		
267:08	trying to acquire.		
267:09	Q. Okay. Well, as recently as like 2022,		
267:10	it's been a big focus for Uber, right?		
267:11	A. It looks like, yeah, from this campaign,		
267:12	yes.		
267:13	Q. Okay.		
267:14	MS. WALSH: Well, let's look at another		
267:15	campaign or another marketing document, which we'll		
267:16	mark as --		
267:17	MR. REDE: 1055.		
267:18	MS. WALSH: -- 1055.		
267:20 - 268:14	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:33	RE_v4p.67
267:20	(Exhibit 1055 was marked for		
267:21	identification by the Court Reporter and is		
267:22	attached hereto.)		
267:23	Q. (By Ms. Walsh) And this is actually		
267:24	looking at marketing planning for 2023, right?		
267:25	A. It looks like it, yeah.		
268:01	Q. So just two years ago?		
268:02	A. Yes.		
268:03	Q. Okay. And this is 2023 planning for the		
268:04	United States and Canada regional market, right?		
268:05	A. Yes.		
268:06	It looks like specifically the mobility		
268:07	team.		
268:08	Q. Right, which again is --		
268:09	A. Rideshare.		
268:10	Q. -- rideshare, yep.		
268:11	Okay. And this is -- if you look at the		
268:12	second page, this actually a two-day off-site		
268:13	focusing on marketing planning, right?		
268:14	A. Yes.		
268:15 - 269:14	Ross, Elizabeth 2025-06-11 - PIP MP4	00:01:00	RE_v4p.68
268:15	Q. Okay. And if you look at page 4, it		
268:16	says -- talks about "Our Ambition for 2023," right?		
268:17	A. Yes.		

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DESIGNATION	SOURCE	DURATION	ID
	268:18 Q. It says, "While 2022 was a year of 268:19 rebuilding in a post-COVID world, 2023 will be all 268:20 about supercharging mobility growth and hitting 268:21 very aggressive targets." 268:22 Do you see that? 268:23 A. I do. 268:24 Q. And you understand that to be targets for 268:25 bringing more customers onto -- more customers 269:01 taking Uber rides and Uber making more money? 269:02 A. Yeah, I don't know the targets that he's 269:03 necessarily talking about -- or, sorry, I say "he," 269:04 but I -- I assume it's Nick Silver's team. 269:05 But, yes, it's probably most likely 269:06 business targets that we have. 269:07 Q. Okay. And business targets would include 269:08 things like revenue, right? 269:09 A. Uh-huh. 269:10 Q. Profit, right? 269:11 A. Monthly active users. 269:12 Q. How many people are taking Uber rides -- 269:13 A. Uh-huh. 269:14 Q. -- right?		
270:03 - 270:07	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:15	RE_v4p.69
	270:03 Q. And you see there (edited) 270:04 a number of key takeaways. And third from the 270:05 bottom, you see one of the key takeaways is "Women 270:06 Women, Women," right? 270:07 A. Yes, I see that.		
270:13 - 271:07	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:47	RE_v4p.70
	270:13 Q. it also talks as, "Families (edited) 270:14 as Riders, with Women as the Chief Planning Officer 270:15 of the family," right? 270:16 A. Yes, I see that. 270:17 Q. And it says, "Marketing will be more 270:18 important partner than ever before," right? 270:19 A. Yes, because this looks like it's coming 270:20 from the US&C operations team. 270:21 Q. Right. 270:22 And -- and Uber at this time, and even 270:23 prior to this, saw like growth of popularity among		

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DESIGNATION	SOURCE	DURATION	ID
	270:24 women as a huge opportunity for growth for the 270:25 company, right? 271:01 A. It looks like from this slide, yes, that 271:02 this is an opportunity that the US&C ops team have 271:03 outlined. 271:04 Q. Okay. An opportunity to get more women 271:05 using Uber more often, right? 271:06 A. Yeah, it looks like that's the sentiment 271:07 behind this bullet.		
271:22 - 272:04	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:28	RE_v4p.71
	271:22 And in particular, Uber looked at, over 271:23 time, not just persuading women that Uber was safe 271:24 in general but that it was safe to take Uber alone 271:25 and at night, right? 272:01 A. I -- again, I don't like the word 272:02 "persuading." But, yes, I think we, like, educate 272:03 women around the fact that Uber is a safe and 272:04 reliable way to get to where they need to go.		
274:15 - 274:25	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:31	RE_v4p.72
	274:15 Q. And one thing that Uber wanted to (edited) 274:16 do was to persuade more women to take Uber rides 274:17 alone and late at night, right? 274:18 A. I -- I don't -- I don't agree with that, 274:19 necessarily. I think, again, we want to make sure 274:20 women and consumers understand how to use the 274:21 product, understand what they have available to 274:22 them, so that they can make the choice to use it. 274:23 I don't think we necessarily said, You 274:24 should take these rides specifically at night and 274:25 only at night.		
276:03 - 276:09	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:12	RE_v4p.73
	276:03 MS. WALSH: Let's take a look at this 276:04 document, which we're going to mark -- 276:05 MR. REDE: 1056, AW54. 276:06 MS. WALSH: -- 1056 to your deposition. 276:07 (Exhibit 1056 was marked for 276:08 identification by the Court Reporter and is 276:09 attached hereto.)		
278:01 - 278:03	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:07	RE_v4p.74

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DESIGNATION	SOURCE	DURATION	ID
	278:01 Q. Okay. And this is a "Rider Safety 278:02 Education (Content Marketing) Brief," right? 278:03 A. Yes.		RE_v4p.74
278:12 - 279:03	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:40	RE_v4p.75
	278:12 Q. Okay. So under "Background Rationale," 278:13 it says, "Safety drives trust in our brand," right? 278:14 A. Yes. 278:15 Q. "Safety is key to our reputation and our 278:16 brand promise," right? 278:17 A. Yes. 278:18 Q. And you agree with those statements? 278:19 A. Yes, I think it's an important piece of 278:20 it. 278:21 Q. Okay. And if we flip down to the second 278:22 page, do you see where it says "Consumer Pain 278:23 Point"? 278:24 A. Yes. 278:25 Q. What does "consumer pain point" mean? 279:01 A. Usually, that refers to just a feeling 279:02 that consumers might have that keeps them from 279:03 maybe using a product or -- yeah.		
280:06 - 280:22	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:39	RE_v4p.76
	280:06 Q. Okay. It says, "1 in 5 riders 280:07 (approximately 3.3 million) limit rides in a given 280:08 month due to safety concern, which is even higher 280:09 among younger and female riders." 280:10 Do you see that? 280:11 A. I do. 280:12 Q. So for younger riders, it's 25 percent of 280:13 riders limit the number of trips they're taking due 280:14 to safety concerns, right? 280:15 A. Yeah, that's what it looks like. 280:16 Q. And for female riders, it's 23 percent, 280:17 right? 280:18 A. Yes. 280:19 Q. Okay. So younger people and women are 280:20 limiting how much they're using Uber because of 280:21 concerns about the safety of Uber, right? 280:22 A. That's what it looks like, yes.		
281:19 - 282:19	Ross, Elizabeth 2025-06-11 - PIP MP4	00:01:13	RE_v4p.77

RE_v4p - ROSS, ELIZABETH - v04p_ As-Played in Court 01/14-15/2026

DESIGNATION	SOURCE	DURATION	ID
	281:19 And then it goes on to say, "Addressing 281:20 safety concerns when alone (approximately 7 million 281:21 trips per month) or late at night (+6 million trips 281:22 per month) present the biggest opportunities for 281:23 growth." 281:24 Do you see that? 281:25 A. I do. 282:01 Q. Okay. And so in this document, Uber is 282:02 recognizing that if they can address safety 282:03 concerns that people have about taking Uber alone 282:04 or taking it late at night, that's going to present 282:05 a big opportunity for growth for Uber, right? 282:06 A. Yes. 282:07 Q. Okay. 282:08 A. That's what it says. 282:09 Q. And Uber does in fact, through its 282:10 multichannel marketing, hold itself out as being a 282:11 safe way to get around when you -- at night when 282:12 you're alone, including if you're a woman, right? 282:13 A. Yeah. I don't think we, like, say those 282:14 specific words necessarily. But yes, we talk 282:15 about -- or we show people taking trips at night 282:16 and tell people that it's available 24/7. So yes, 282:17 they can make the decision of when they want to 282:18 take it, and if at night, that's -- that's -- that 282:19 is an option.		RE_v4p.77
283:17 - 283:20	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:13	RE_v4p.78
	283:17 Q. But you would agree that that decision is 283:18 not fully informed by the internal data that you 283:19 all have about how much more dangerous it is for 283:20 women to take Uber alone and at night, right?		
283:23 - 285:17	Ross, Elizabeth 2025-06-11 - PIP MP4	00:01:55	RE_v4p.79
	283:23 THE DEPONENT: Again, I think I've said 283:24 this a few times too, but I think that we provide 283:25 them with a lot of information so that they can 284:01 make a decision. 284:02 I would say that there are other 284:03 companies that also don't share every single 284:04 possible risk that can happen, and especially 284:05 because the risk on Uber is so low. Like you saw		

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DESIGNATION	SOURCE	DURATION	ID
284:06	in the safety report, 99.9 percent of trips do not		
284:07	have an incident that occurs.		
284:08	And there are other transportation		
284:09	companies that do not share that risk before every		
284:10	single trip that you take.		
284:11	Q. (By Ms. Walsh) Do you think it's --		
284:12	that -- well, I will put aside this -- this case is		
284:13	about Uber, right?		
284:14	A. Yes.		
284:15	Q. Okay. And Uber holds itself out as a		
284:16	leader in the area of safety, right?		
284:17	A. Yes.		
284:18	Q. So you're not trying to hide behind what		
284:19	other companies --		
284:20	A. No.		
284:21	Q. -- do?		
284:22	A. No, I'm not.		
284:23	Q. Okay.		
284:24	A. But I am just trying to put into context		
284:25	that there are other instances where, when out of		
285:01	context, if there is a number put in front of		
285:02	somebody about a very, very rare possible risk that		
285:03	could happen to them and it doesn't provide more		
285:04	details of how frequently that happens and how many		
285:05	trips, it can be fear-based marketing, and we don't		
285:06	necessarily do that.		
285:07	Q. So you're worried about scaring women?		
285:08	A. No. I think we actually provide a lot of		
285:09	very clear information to women, to consumers,		
285:10	through our safety report. And, yeah, I think		
285:11	that's clear.		
285:12	Q. And you provide that 99.9 percent of		
285:13	trips end without any safety incident, right?		
285:14	A. In the safety report, yes.		
285:15	Q. And you just repeated it to the jury,		
285:16	right?		
285:17	A. Yes.		
286:02 - 287:05	Ross, Elizabeth 2025-06-11 - PIP MP4	00:01:00	RE_v4p.80
286:02	What's the percentage if you're just		
286:03	looking at the number -- if you're just looking at		

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DESIGNATION	SOURCE	DURATION	ID
286:04	rides involving women, how frequent are serious		
286:05	safety events then?		
286:06	A. I don't know that number off the top of		
286:07	my head.		
286:08	Q. And you don't tell women that number		
286:09	either, do you?		
286:10	A. No, we do not.		
286:11	Q. What's the number if you look at women		
286:12	taking Uber after 11:00 p.m.? What's the		
286:13	percentage then of zero safety events?		
286:14	A. Again, I don't know that number off the		
286:15	top of my head.		
286:16	Q. And you don't provide that number --		
286:17	A. No.		
286:18	Q. -- to women either, right?		
286:19	A. No.		
286:20	Q. What's the number of safety events that		
286:21	occur for rides where the pickup occurs in close		
286:22	proximity to a bar or nightclub?		
286:23	A. I don't know that number.		
286:24	Q. And that's not information that you		
286:25	provide, right?		
287:01	A. No.		
287:02	Q. You provide that 99 percent number,		
287:03	right?		
287:04	A. And a lot more information within the		
287:05	safety report itself.		
288:02 - 288:17	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:46	RE_v4p.81
288:02	But it's impossible for someone looking		
288:03	at the safety report to see how rare or how common		
288:04	these incidents are for women taking Uber at night		
288:05	by themselves, right?		
288:06	A. Yes.		
288:07	Q. And if someone were to say to you, I'd		
288:08	like to know that number so that I feel like I can		
288:09	make an informed choice about whether I feel		
288:10	comfortable taking Uber, would you say, we're not		
288:11	going to give that to you?		
288:12	A. It's not my decision to share that		
288:13	number, and I don't -- also don't know that number		

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DESIGNATION	SOURCE	DURATION	ID
	288:14 myself. So it would be up to someone above my pay		
	288:15 grade to make that call.		
	288:16 Q. That wasn't your job?		
	288:17 A. It's not my job.		
290:21 - 291:04	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:27	RE_v4p.82
	290:21 Q. And, Ms. Ross, Uber understands that when		
	290:22 you compare people taking an Uber at night versus		
	290:23 taking an Uber during the day, people who are		
	290:24 taking Uber at night are more likely to have been		
	290:25 drinking?		
	291:01 A. Potentially, yes. I think people drink		
	291:02 throughout the day sometimes, but yes, there is		
	291:03 usually a higher propensity of people drinking at		
	291:04 night.		
303:21 - 304:15	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:43	RE_v4p.83
	303:21 Q. (By Ms. Walsh) But you know that a lot		
	303:22 of people who take Uber late at night have been		
	303:23 drinking to excess, right?		
	303:24 A. Yes, I know a lot of people take Uber		
	303:25 when they've been drinking.		
	304:01 Q. Including drinking to excess?		
	304:02 A. Yes, I'm sure people drink to excess and		
	304:03 get in the car, yes.		
	304:04 Q. You get a lot of reports about people --		
	304:05 from drivers about riders who vomited in their		
	304:06 cars, right?		
	304:07 A. Yes.		
	304:08 Q. So you're -- you are well-aware that that		
	304:09 is something that happens on Uber rides, that		
	304:10 people who've had way too much to drink get into		
	304:11 those cars?		
	304:12 A. Yes.		
	304:13 Q. Okay. And that can be a really dangerous		
	304:14 thing to do?		
	304:15 A. Yes, it can be.		
304:18 - 305:17	Ross, Elizabeth 2025-06-11 - WIT MP4	00:01:03	RE_v4p.84
	304:18 Q. (By Ms. Walsh) Well, and that's		
	304:19 something that Uber's looked at and considered, the		
	304:20 dangers that can come with that, right?		
	304:21 A. Yeah.		

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DESIGNATION	SOURCE	DURATION	ID
	304:22 I mean, I think from the documents that		
	304:23 we've looked at, we've seen that those risks are		
	304:24 there.		
	304:25 And I think we also understand there's		
	305:01 risks, like I've mentioned, with other ways of		
	305:02 getting home too, like getting behind the wheel if		
	305:03 you're drinking or getting on the subway and		
	305:04 completely blacked-out drunk.		
	305:05 And we're just one of the options that		
	305:06 people can use to get home.		
	305:07 Q. An option that -- where -- you all, in		
	305:08 your marketing, hold yourself out as being safe --		
	305:09 a way to safely get home, right?		
	305:10 A. A safe option, yes.		
	305:11 Q. Okay. A safe option with no warning		
	305:12 about the fact that sometimes it's not so safe,		
	305:13 right?		
	305:14 A. No warning, but I think the reality is		
	305:15 all transportation options are not safe when you're		
	305:16 completely drunk and not able to make decisions or		
	305:17 know what's going on, unfortunately.		
309:08 - 309:08	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:03	RE_v4p.85
	309:08 MS. WALSH: 1059 to your deposition.		
309:15 - 310:01	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:31	RE_v4p.86
	309:15 Q. So this is a (edited)		
	309:16 document from May 2018, right?		
	309:17 A. Yes.		
	309:18 Q. And it says "U.S./Canada" -- that's		
	309:19 "CAN," right?		
	309:20 A. Yes.		
	309:21 Q. "U.S./Canada Opportunity Analysis,"		
	309:22 right?		
	309:23 A. Yes.		
	309:24 Q. And if we flip forward two slides, do you		
	309:25 see where it says "Audit Background and Overview"?		
	310:01 A. Yes.		
313:02 - 313:12	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:22	RE_v4p.87
	313:02 Q. Okay. And if we look below, it says, for		
	313:03 this particular audit, 284 sexual assault reports		
	313:04 were audited, right?		

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DESIGNATION	SOURCE	DURATION	ID
	313:05 A. Yes.		
	313:06 Q. 52 percent of them, or 147, include a		
	313:07 suspected intoxicated rider, right?		
	313:08 A. Yes.		
	313:09 Q. Of those, 50 percent, 74, have a male		
	313:10 driver has an accused party.		
	313:11 Do you see that?		
	313:12 A. Yes.		
317:21 - 317:23	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:10	RE_v4p.88
	317:21 Q. (By Ms. Walsh) And this document that		
	317:22 we'll look, at AW174, which we're going to mark as		
	317:23 Exhibit 1060 to your deposition, this is actually		
317:24 - 318:06	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:23	RE_v4p.89
	317:24 from 2024, so just last year, right?		
	317:25 A. Yes.		
	318:01 Q. Okay. And you can see that the title of		
	318:02 this deck is "Intoxicated Riders Checkpoint Deck,"		
	318:03 right?		
	318:04 A. Yes.		
	318:05 Q. And the date is April 2nd, 2024, right?		
	318:06 A. Yes.		
320:21 - 320:21	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:06	RE_v4p.90
	320:21 Q. Okay. And if we scroll forward to the		
320:22 - 322:12	Ross, Elizabeth 2025-06-11 - PIP MP4	00:01:45	RE_v4p.91
	320:22 next slide, it says, "Intoxicated riders are a		
	320:23 major contributor or victim of critical safety		
	320:24 incidents on the platform."		
	320:25 Do you see that?		
	321:01 A. I do, yeah.		
	321:02 Q. And so this is Uber just last year		
	321:03 sharing internally, within the company, that where		
	321:04 someone is riding an Uber intoxicated, that can		
	321:05 contribute to them being the victim of a critical		
	321:06 safety incident during their Uber ride, right?		
	321:07 A. Yes, it looks like in this statement that		
	321:08 the product team wrote in the deck, it says that		
	321:09 that is part of the -- yes, yes.		
	321:10 Q. And you don't have any reason to dispute		
	321:11 what was written just last year by the team that		

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DESIGNATION	SOURCE	DURATION	ID
	321:12 put together this deck, do you?		
	321:13 A. Based off of what they're sharing above,		
	321:14 it looks like that's what the product manager is		
	321:15 concluding off of that.		
	321:16 Q. Okay.		
	321:17 A. It does seem, in my opinion, a little bit		
	321:18 of an intense statement to make.		
	321:19 Q. Well, have you looked at this issue to		
	321:20 determine the extent to which intoxication can		
	321:21 contribute to becoming a victim of a critical		
	321:22 safety incident on the Uber platform?		
	321:23 A. I mean, from what you've shown me		
	321:24 today -- I have not seen this deck before this from		
	321:25 the product team, but, yes, there are trends		
	322:01 obviously that show that -- that at night and on		
	322:02 weekends and then adding in intoxication can lead		
	322:03 to that.		
	322:04 Q. Okay. You feel like that's -- this is		
	322:05 kind of extreme, though?		
	322:06 A. Just the way it's phrased.		
	322:07 Q. Okay.		
	322:08 A. Yes.		
	322:09 Q. It's certainly not a statement that's		
	322:10 ever been included in any of Uber's marketing		
	322:11 materials, right?		
	322:12 A. No, it is not.		
330:01 - 330:22	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:51	RE_v4p.92
	330:01 This next slide, what is said in this		
	330:02 deck is that -- it identifies "Intoxication as a		
	330:03 contributing factor to elevated risks of SA/SM."		
	330:04 Do you see that?		
	330:05 A. I do.		
	330:06 Q. And that's sexual assault and sexual		
	330:07 misconduct, right?		
	330:08 A. Yes.		
	330:09 Q. It says, "Intoxication is a risk factor		
	330:10 for sexual assault and sexual misconduct in		
	330:11 Mobility and Delivery," right?		
	330:12 A. Yes.		
	330:13 Q. It says, "Evenings, weekends and late		

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DESIGNATION	SOURCE	DURATION	ID
	330:14 night are especially risky for sexual assault and 330:15 sexual misconduct," right? 330:16 A. Yes, it says that. 330:17 Q. It says, "Evening and late night trips 330:18 are anywhere from 2 to 11 times riskier than 330:19 daytime trips and make up 50 percent of all sexual 330:20 assault and sexual misconduct incidents globally," 330:21 right? 330:22 A. Yes, that's what it says.		
331:24 - 332:18	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:49	RE_v4p.93
	331:24 Q. Okay. So we've got identified here some 331:25 specific data-driven conclusions that Uber reached 332:01 just last year, in 2024, according to this 332:02 presentation, right? 332:03 A. Yes, it looks like it. 332:04 Q. And as far as you know, this data and 332:05 these data-driven conclusions are not included in 332:06 any safety report that's been released to the 332:07 public? 332:08 A. Not that I'm aware of, no. 332:09 Q. Not cited in the App Store? 332:10 A. No. 332:11 Q. Not noted even, like, in fine print in 332:12 the app, right? 332:13 A. No. 332:14 Q. And of all the marketing materials you've 332:15 looked at and all of the many channels where Uber 332:16 markets, have you seen these statistics being 332:17 provided to consumers? 332:18 A. No, they are not.		
335:13 - 335:14	Ross, Elizabeth 2025-06-11 - WIT MP4	00:00:07	RE_v4p.94
	335:13 Let's take a look at AW176, (edited) 335:14 which is 1061.		
336:02 - 336:05	Ross, Elizabeth 2025-06-11 - PIP MP4	00:00:05	RE_v4p.95
	336:02 Q. Okay. And this document is from April of 336:03 2019. 336:04 Do you see that? 336:05 A. I do.		
337:06 - 338:17	Ross, Elizabeth 2025-06-11 - PIP MP4	00:01:22	RE_v4p.96

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DESIGNATION	SOURCE	DURATION	ID
	337:06 Q. (By Ms. Walsh) -- do you see here where		RE_v4p.96
	337:07 it says, "Problem. With the use of rideshare,		
	337:08 police have seen DUI's reduced, but increases in		
	337:09 excessive alcohol consumption"?		
	337:10 A. Yes, I see that.		
	337:11 Q. Okay. So that's what's being reported by		
	337:12 the folks who worked at this Don'tStandBy		
	337:13 initiative at Uber, right?		
	337:14 A. Yes, that's what they're -- yeah.		
	337:15 Q. That's what they're saying they've		
	337:16 learned from the police, right?		
	337:17 A. Yes.		
	337:18 Q. It says, "Alcohol plays a role in sexual		
	337:19 assault."		
	337:20 Do you see that?		
	337:21 A. I do.		
	337:22 Q. "In the large majority of sexual		
	337:23 assaults" -- or "SA reports, police and advocates		
	337:24 confirm the victim was typically alone in an		
	337:25 intoxicated, vulnerable state when the assault		
	338:01 occurred."		
	338:02 Do you see that?		
	338:03 A. I do.		
	338:04 Q. And that means sexual assault reports		
	338:05 that were made to Uber, right?		
	338:06 A. I -- I guess it doesn't say that, but		
	338:07 that could be assumed because this is an Uber deck.		
	338:08 It could be, yes.		
	338:09 Q. Okay. Well, it goes on to say,		
	338:10 "Rideshare is commonly used for friends and		
	338:11 security to send an overly intoxicated individual		
	338:12 home."		
	338:13 Do you see that?		
	338:14 A. Yes.		
	338:15 Q. And it says, "This leaves riders		
	338:16 vulnerable on the Uber platform," right?		
	338:17 A. Yes.		
390:14 - 390:15	Ross, Elizabeth 2025-06-12 - WIT MP4	00:00:01	RE_v4p.97
	390:14 we're (edited)		
	390:15 going to mark this --		

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DESIGNATION	SOURCE	DURATION	ID
390:17 - 390:17	Ross, Elizabeth 2025-06-12 - WIT MP4 390:17 MS. WALSH: -- as 1063.	00:00:02	RE_v4p.98
391:17 - 391:25	Ross, Elizabeth 2025-06-12 - PIP MP4 391:17 This is a document about safety planning 391:18 for 2025, right? 391:19 A. Yes. 391:20 Q. And it was created in October of 2024, 391:21 right? 391:22 A. Yes, it looks like that. 391:23 Q. Okay. And so that was just last year, 391:24 right? 391:25 A. Yes.	00:00:14	RE_v4p.99
392:16 - 393:09	Ross, Elizabeth 2025-06-12 - WIT MP4 392:16 And it says, "Our products inherently 392:17 bring people closer, be it in a car or having 392:18 someone open their home's door to a stranger. 392:19 Interpersonal violence is a serious, real threat in 392:20 these situations." 392:21 Do you see that? 392:22 A. I do. 392:23 Q. So the Uber product, by bringing people 392:24 closer, including in a car, create a risk, a 392:25 threat, of interpersonal violence, correct? 393:01 A. Yes, it does, yes. 393:02 Q. Okay. And because Uber's business, by 393:03 bringing people together in that way, including in 393:04 a car, create that threat of interpersonal 393:05 violence, what it says here is, addressing it, 393:06 addressing that threat, "is essential to ensuring 393:07 the well-being of all users." 393:08 Do you see that? 393:09 A. Yes, I do.	00:00:53	RE_v4p.100
393:19 - 394:03	Ross, Elizabeth 2025-06-12 - WIT MP4 393:19 Q. (By Ms. Walsh) Okay. So does Uber agree 393:20 that it's essential for Uber to take steps to 393:21 address that threat of interpersonal violence? 393:22 A. I think that the fact that there is an 393:23 entire team, or many, many teams, that are here 393:24 looking at these things every day in their job and 393:25 trying to think of how we can help address these	00:00:38	RE_v4p.101

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DESIGNATION	SOURCE	DURATION	ID
	394:01 issues, yes, I think Uber cares about these things		
	394:02 deeply and is trying to build and work on these		
	394:03 things every day.		
394:13 - 395:04	Ross, Elizabeth 2025-06-12 - WIT MP4	00:00:35	RE_v4p.102
	394:13 Q. Okay. Okay. And this document then goes		
	394:14 on to say, "By proactively preventing and		
	394:15 effectively responding to incidents, Uber can		
	394:16 safeguard its users, build trust, and ultimately		
	394:17 retain a loyal customer base."		
	394:18 Do you see that?		
	394:19 A. Yes.		
	394:20 Q. Okay. So Uber has a responsibility to		
	394:21 safeguard its users, right?		
	394:22 A. Yes, that's one of our jobs.		
	394:23 Q. Okay. Uber -- including to safeguard		
	394:24 them from sexual assault, right?		
	394:25 A. Yes.		
	395:01 Q. Okay. Uber is also interested in		
	395:02 building trust and retaining a loyal customer base,		
	395:03 right?		
	395:04 A. Yes.		
401:14 - 401:14	Ross, Elizabeth 2025-06-12 - WIT MP4	00:00:02	RE_v4p.103
	401:14 And this is Exhibit 1052.		
402:09 - 402:16	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:16	RE_v4p.104
	402:09 Q. Okay. And it talks about, "We have to		
	402:10 ensure people trust us with their safety too,"		
	402:11 right?		
	402:12 A. Yes, it says that.		
	402:13 Q. And we've agreed that -- that getting --		
	402:14 building that trust, gaining that trust is		
	402:15 essential to Uber's business, right?		
	402:16 A. Yes, I believe it is.		
418:25 - 419:15	Ross, Elizabeth 2025-06-12 - WIT MP4	00:00:36	RE_v4p.105
	418:25 Hitchhiking is not something that people		
	419:01 do a lot of these days, as far as you're aware?		
	419:02 A. I hope not.		
	419:03 Q. Okay. People think of hitchhiking as		
	419:04 being pretty dangerous, right?		
	419:05 A. I would assume, yes; I would not do it.		

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DESIGNATION	SOURCE	DURATION	ID
	419:06 Q. Okay. And that's in part because you're 419:07 getting into a confined space with someone who you 419:08 don't know, and in that confined space, you're 419:09 going to be traveling at great speeds, and that 419:10 could be dangerous, right? 419:11 A. Yes, in that format, yes. 419:12 Getting into a car with a stranger that 419:13 you don't know, that hasn't gone through extensive 419:14 background checks and screenings and all of that, 419:15 yes, I would -- I would never do that personally.		
419:17 - 420:02	Ross, Elizabeth 2025-06-12 - WIT MP4	00:00:34	RE_v4p.106
	419:17 And so what Uber does is it -- it makes 419:18 assertions about its extensive background checks 419:19 and screenings, and it builds up trust in its Uber 419:20 brand, and it does other things to reduce the 419:21 natural uncertainty that most people have about 419:22 getting in a car with a stranger so that they'll 419:23 actually use Uber, right? 419:24 A. Yes, I believe that we clearly educate 419:25 users around the processes, policies, screenings, 420:01 features, everything that we have in place to make 420:02 sure that the experience is as safe as possible.		
420:09 - 421:05	Ross, Elizabeth 2025-06-12 - WIT MP4	00:00:59	RE_v4p.107
	420:09 Q. Well, you just stated that you educate 420:10 users around the processes, policies, screenings, 420:11 features and everything that we have in place to 420:12 make sure that they have an experience that is as 420:13 safe as possible, right? 420:14 A. Yes. 420:15 Q. Okay. So if you're going to hold out a 420:16 feature saying, This can -- this can help make your 420:17 experience safer, Uber should have a basis for 420:18 saying that, right? 420:19 A. Yeah, and when you say "hold out," what 420:20 are you referring to? 420:21 Q. Market. 420:22 A. When marketing? 420:23 Q. Right. 420:24 A. Okay. Yeah, when we develop features and 420:25 policies, the basis behind them is that it will		

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DESIGNATION	SOURCE	DURATION	ID
	421:01 help people -- when they are on a trip, it will		
	421:02 help them feel and be safe when on a ride.		
	421:03 Q. Okay.		
	421:04 A. I wouldn't say that we develop features		
	421:05 that aren't there to do something like that.		
452:19 - 453:04	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:24	RE_v4p.108
	452:19 Q. (By Ms. Walsh) Okay. Ms. Ross, one of		
	452:20 the features that Uber has marketed quite a bit		
	452:21 is -- is the RideCheck feature, right?		
	452:22 A. Yes, yeah.		
	452:23 Q. And Uber holds the RideCheck feature out		
	452:24 as a safety feature, right?		
	452:25 A. Yes. Which I believe it is.		
	453:01 Q. Okay. Let's go ahead and look at some of		
	453:02 that marketing --		
	453:03 A. Sure.		
	453:04 Q. -- to start.		
453:08 - 453:14	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:03	RE_v4p.109
	453:08 MS. WALSH: -- which I'm going to mark		
	453:09 as 1067.		
	453:10 (Court Reporter discussion off the		
	453:11 stenographic record.)		
	453:12 (Exhibit 1067 was marked for		
	453:13 identification by the Court Reporter and is		
	453:14 attached hereto.)		
453:23 - 454:11	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:28	RE_v4p.110
	453:23 Q. And is it fair to say that this piece of		
	453:24 Uber marketing was in effect sometime 2020, 2021,		
	453:25 at a time when people were still wearing masks		
	454:01 because of COVID-19, right?		
	454:02 A. Yeah, it looks like it's probably 2021,		
	454:03 honestly.		
	454:04 Q. Okay. Is this a piece of marketing that		
	454:05 you looked at in preparing for your deposition		
	454:06 today?		
	454:07 A. Yes. And my team worked on it --		
	454:08 Q. Okay.		
	454:09 A. -- personally, yeah.		
	454:10 Q. You personally worked on this?		
	454:11 A. Yes, my team did.		

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DESIGNATION	SOURCE	DURATION	ID
455:15 - 455:24	Ross, Elizabeth 2025-06-12 - PIP MP4 455:15 Q. (By Ms. Walsh) It says, "Setting the 455:16 standard in rideshare safety. We're proud to lead 455:17 the industry by introducing features like an in-app 455:18 emergency button and RideCheck technology." 455:19 Do you see that? 455:20 A. I do. 455:21 Q. "All to help you feel more protected on 455:22 every trip." 455:23 Do you see that? 455:24 A. Yes.	00:00:18	RE_v4p.111
463:07 - 463:11	Ross, Elizabeth 2025-06-12 - WIT MP4 463:07 Q. And people -- if they think that things 463:08 like RideCheck could -- if a woman thinks that 463:09 something like RideCheck could actually help her if 463:10 she's being sexually assaulted, that will make her 463:11 feel more comfortable in taking an Uber, right?	00:00:15	RE_v4p.112
464:06 - 464:11	Ross, Elizabeth 2025-06-12 - WIT MP4 464:06 THE DEPONENT: I think a consumer, a 464:07 woman or a man, could read and learn about 464:08 RideCheck and could understand and know that it's 464:09 something that is available to them when they're on 464:10 a trip. Or if an instance happens, they know that 464:11 it could pop up and help them in that time of need.	00:00:19	RE_v4p.113
469:09 - 469:12	Ross, Elizabeth 2025-06-12 - WIT MP4 469:09 Q. Uber doesn't actually know if RideCheck 469:10 improves safety, does it? 469:11 A. I can't answer that question. It's 469:12 outside the scope of my job.	00:00:15	RE_v4p.114
469:13 - 470:19	Ross, Elizabeth 2025-06-12 - WIT MP4 469:13 Q. So as a marketer who is committed to 469:14 accurate, truthful, nonmisleading marketing, you 469:15 haven't made an effort to understand whether these 469:16 things that you're marketing as safety features 469:17 actually improve safety? 469:18 A. I wouldn't say that. 469:19 I would say that I can't give you the 469:20 number that you might potentially be looking for to 469:21 define that this has improved safety on the	00:01:35	RE_v4p.115

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DESIGNATION	SOURCE	DURATION	ID
	469:22 platform. That number, I do not know.		
	469:23 Q. Not looking for a number.		
	469:24 I'm looking whether Uber can testify that		
	469:25 before it, well, put this marketing communication		
	470:01 out, before it held out RideCheck as a safety		
	470:02 feature, did Uber's marketing department seek to		
	470:03 confirm for itself that that feature actually does		
	470:04 improve safety?		
	470:05 A. Again, like I mentioned before, we don't		
	470:06 go out and test to say like, in this incident, has		
	470:07 this improved the safety when an incident is		
	470:08 happening.		
	470:09 We built the technology because we knew		
	470:10 that these types of things might be happening on		
	470:11 the platform, and we want to avoid any bad thing		
	470:12 happening on a trip.		
	470:13 And so the team went above and beyond to		
	470:14 build technology that actually helps detect		
	470:15 possible anomalies that happen on the platform		
	470:16 when, again, we can't be in the car with every		
	470:17 single person and make sure nothing goes wrong,		
	470:18 because there is an amount of risk that people take		
	470:19 as they -- they take trips on any platform.		
470:23 - 471:19	Ross, Elizabeth 2025-06-12 - WIT MP4	00:00:50	RE_v4p.116
	470:23 Q. So you understand that people (edited)		
	470:24 within Uber -- I know you're in marketing, but		
	470:25 there are safety experts within Uber who actually		
	471:01 look to assess the effectiveness of these safety		
	471:02 features to see if they're actually working to		
	471:03 improve the safety of Uber's riders, right?		
	471:04 A. Yes.		
	471:05 Q. And that's not something that you're an		
	471:06 expert in, right?		
	471:07 A. I am not an expert in it, no.		
	471:08 Q. But do you at least make sure to know the		
	471:09 results of those analyses to decide if this is a		
	471:10 fair thing -- way to be marketing?		
	471:11 A. Yes, I understand what the -- the product		
	471:12 does, and I understand how it works and -- and how		
	471:13 a user should use it so that I can understand how		

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DESIGNATION	SOURCE	DURATION	ID
	471:14 to speak clearly to a consumer about how to use 471:15 this. 471:16 And then, yes, as products roll out, we 471:17 do see performance of what they do and support 471:18 tickets and reports on that. But I don't have that 471:19 top of mind to speak to today.		
474:05 - 474:12	Ross, Elizabeth 2025-06-12 - PIP MP4 474:05 Q. (By Ms. Walsh) Okay. We're going to 474:06 look now, Ms. Ross, at evidence that within Uber, 474:07 the folks who actually work in safety were 474:08 questioning whether this RideCheck feature, which 474:09 you call a safety feature, actually does help 474:10 protect people using -- using the app. 474:11 Okay? 474:12 A. Okay.	00:00:22	RE_v4p.117
474:19 - 474:19	Ross, Elizabeth 2025-06-12 - PIP MP4 474:19 MS. WALSH: So let's mark this as --	00:00:02	RE_v4p.118
474:21 - 474:21	Ross, Elizabeth 2025-06-12 - PIP MP4 474:21 MS. WALSH: 1068.	00:00:01	RE_v4p.119
474:24 - 475:06	Ross, Elizabeth 2025-06-12 - PIP MP4 474:24 (Exhibit 1068 was marked for 474:25 identification by the Court Reporter and is 475:01 attached hereto.) 475:02 Q. (By Ms. Walsh) And you can see that the 475:03 title of this document is "RideCheck Holdout Group 475:04 Safety Effective [sic] Measurement." 475:05 Do you see that? 475:06 A. I do.	00:00:07	RE_v4p.120
475:17 - 475:23	Ross, Elizabeth 2025-06-12 - PIP MP4 475:17 You're aware that this is something that 475:18 Uber sometimes does, which is to try to measure the 475:19 effectiveness of a purported safety feature, right? 475:20 A. I wasn't aware of this specifically. 475:21 This is the first I've seen this. 475:22 But, yes, like there are holdout groups 475:23 that happens sometimes.	00:00:15	RE_v4p.121
477:14 - 477:25	Ross, Elizabeth 2025-06-12 - PIP MP4 477:14 Q. Okay. So you can't tell this jury 477:15 whether or not the marketing people actually	00:00:39	RE_v4p.122

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DESIGNATION	SOURCE	DURATION	ID
	477:16 considered this analysis in determining whether 477:17 it's -- whether the way that you all are marketing 477:18 the RideCheck feature is appropriate? 477:19 A. Yeah, just because I have never seen this 477:20 before. 477:21 Q. Okay. You -- as far as you know, the 477:22 people within Uber's marketing department have not 477:23 considered this in determining whether it's fair 477:24 and accurate to be holding the RideCheck feature 477:25 out as a safety feature?		
478:02 - 478:14	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:39	RE_v4p.123
	478:02 THE DEPONENT: As far as I'm aware, 478:03 marketing did not see this document. 478:04 Q. (By Ms. Walsh) Okay. So -- 478:05 A. And just to clarify quickly, when I say 478:06 "marketing," I am mostly referring to myself and my 478:07 team that focuses on safety marketing. I'm not 478:08 aware if like broader marketing was ever shared 478:09 with this. But my assumption would be no. 478:10 Q. Okay. The people who actually work to 478:11 try to market Uber as a safe option for 478:12 transportation, you, sitting here today, don't know 478:13 whether those people ever looked at this analysis? 478:14 A. Correct.		
478:21 - 479:18	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:44	RE_v4p.124
	478:21 Q. (By Ms. Walsh) Do you see where it says 478:22 "Problem Statement"? 478:23 A. Yes. 478:24 Q. It says -- and this is as of 2024 -- "We 478:25 don't know RideCheck's current (baseline) impact on 479:01 incident rate and want to track that for future 479:02 changes." 479:03 Do you see that? 479:04 A. Yes, I do. 479:05 Q. So at this time -- you understand 479:06 "incident rate" that -- to refer to safety 479:07 incidents occurring on the platform, right? 479:08 A. Yes. 479:09 Q. And that would include sexual assault, 479:10 right?		

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DESIGNATION	SOURCE	DURATION	ID
	479:11 A. Yes.		
	479:12 Q. So at this time in 2024, the safety		
	479:13 experts within Uber are saying, We don't know		
	479:14 RideCheck's current, baseline, impact on incident		
	479:15 rate, right?		
	479:16 A. Yes, it looks like they are stating that.		
	479:17 Q. Okay. And if we look -- go forward to		
	479:18 "RideCheck Today," which is slide 5, this is		
479:19 - 481:15	Ross, Elizabeth 2025-06-12 - PIP MP4	00:01:39	RE_v4p.125
	479:19 describing how RideCheck works on the Uber app,		
	479:20 right?		
	479:21 And we talked about this a little bit.		
	479:22 A. Uh-huh.		
	479:23 Q. It looks to see if a car has been stopped		
	479:24 for five-plus minutes; it identifies if the trip		
	479:25 ends earlier than expected, right?		
	480:01 A. Yup.		
	480:02 Q. It identifies if the route is too		
	480:03 different from our estimate, right?		
	480:04 A. Yes.		
	480:05 Q. If those things happen, there might be		
	480:06 some passive interventions, right?		
	480:07 A. Yes.		
	480:08 Q. A push notification, Hey, is everything		
	480:09 okay, which a rider, an Uber rider, may or may not		
	480:10 see depending on what's going on in that car,		
	480:11 right?		
	480:12 A. Yes.		
	480:13 Q. And there's an in-app callout with safety		
	480:14 tools, right?		
	480:15 A. Yes.		
	480:16 Q. And that just means like you -- the Uber		
	480:17 app references the fact that RideCheck exists?		
	480:18 A. What it -- my assumption of what it's		
	480:19 referring to is the fact that when a RideCheck is		
	480:20 triggered and you receive that notification to		
	480:21 check in on you, when you click it and you open it,		
	480:22 a series of safety tools pop up for you to easily		
	480:23 access.		
	480:24 Q. Okay.		

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	480:25 A. Yeah.		
	481:01 Q. So something -- you're being attacked --		
	481:02 say a rider's being attacked within the car. They		
	481:03 might get a -- this passive intervention which is a		
	481:04 text saying, you know, We noticed you've been		
	481:05 stopped for a while; is everything okay?		
	481:06 If they happen to see that and have the		
	481:07 ability, depending what their -- what is happening		
	481:08 to them at that time, to click on it, they might be		
	481:09 taken to some safety tools?		
	481:10 A. Yes.		
	481:11 Q. And that's what RideCheck does?		
	481:12 A. That is what this passive version of it		
	481:13 does, yes.		
	481:14 Q. Okay. And with that in mind, look at		
	481:15 slide 8.		
481:21 - 483:08	Ross, Elizabeth 2025-06-12 - PIP MP4	00:01:19	RE_v4p.126
	481:21 Q. It says "Ops," and that's the operations		
	481:22 people within Uber, right?		
	481:23 A. Yes.		
	481:24 Q. "Has questions re: RideCheck's		
	481:25 effectiveness."		
	482:01 Do you see that?		
	482:02 A. Yes.		
	482:03 Q. "In Serious Incident Investigations, we		
	482:04 are often asked why RideCheck didn't do more: Why		
	482:05 it didn't trigger earlier," right?		
	482:06 A. Uh-huh.		
	482:07 Q. "Why it didn't escalate actions," right?		
	482:08 A. Uh-huh.		
	482:09 Q. And that means escalate, like let other		
	482:10 people within Uber know it seems like something		
	482:11 might be going wrong in this car, maybe we should		
	482:12 do something?		
	482:13 A. It could mean that, yeah.		
	482:14 Q. Okay. And the ops people are asking why		
	482:15 it didn't do that, why it didn't alert safety		
	482:16 people within Uber that something bad could be		
	482:17 happening in the car?		
	482:18 A. Uh-huh.		

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DESIGNATION	SOURCE	DURATION	ID
	482:19 Q. "Why it chose to not act at all."		
	482:20 A. Yes.		
	482:21 Q. So these are the questions that in 2024,		
	482:22 just last year, the safety operations people are		
	482:23 raising about the effectiveness of RideCheck,		
	482:24 right?		
	482:25 A. Yes.		
	483:01 Q. And your testimony as Uber is that the		
	483:02 marketing people didn't look at this or consider		
	483:03 this in deciding how it would be appropriate to		
	483:04 market RideCheck as a safety feature to people		
	483:05 using or considering using Uber, right?		
	483:06 A. Correct. We did not see this document,		
	483:07 no.		
	483:08 Q. Okay. You can put that aside.		
483:14 - 483:14	Ross, Elizabeth 2025-06-12 - WIT MP4	00:00:02	RE_v4p.127
	483:14 We're going to mark this as Exhibit -- (edited)		
483:16 - 483:16	Ross, Elizabeth 2025-06-12 - WIT MP4	00:00:02	RE_v4p.128
	483:16 MS. WALSH: -- 1069.		
483:24 - 484:05	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:23	RE_v4p.129
	483:24 Q. Okay. And what can you tell us about		
	483:25 when this was -- this marketing piece was being		
	484:01 used with Uber riders or prospective riders?		
	484:02 A. This is -- it looks like an email.		
	484:03 Q. Okay.		
	484:04 A. And I believe it was an email that was		
	484:05 developed in 2024.		
487:04 - 487:07	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:11	RE_v4p.130
	487:04 Q. Okay. The purpose of marketing is -- we		
	487:05 looked at this earlier -- you're trying to engender		
	487:06 trust in your company, right?		
	487:07 A. Yes, overall. Yes.		
487:22 - 487:23	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:07	RE_v4p.131
	487:22 Q. You would like people to believe that		
	487:23 Uber is the safest place in every city, right?		
488:01 - 489:20	Ross, Elizabeth 2025-06-12 - PIP MP4	00:01:41	RE_v4p.132
	488:01 THE DEPONENT: Again, I -- I don't		
	488:02 like -- that's not a thing that I would necessarily		
	488:03 say publicly to consumers. But it's something that		

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DESIGNATION	SOURCE	DURATION	ID
488:04	was written in that deck.		
488:05	Q. (By Ms. Walsh) It was something that		
488:06	Uber talked about internally where consumers		
488:07	couldn't see it, right?		
488:08	A. Yes, it was something that was written in		
488:09	an internal document as a goal that we can build		
488:10	towards.		
488:11	Q. And, in fact, if and when this deposition		
488:12	is played to a jury, that would be the first time		
488:13	that people outside of the company see documents		
488:14	like that, right?		
488:15	A. I'm -- yeah, I'm assuming, yes.		
488:16	Q. Okay. And what you say in this marketing		
488:17	piece, at the same time ops is raising questions		
488:18	about RideCheck's effectiveness is "RideCheck:		
488:19	Built for your safety. We hope every trip goes		
488:20	smoothly, but we also know sometimes things don't		
488:21	go as planned - which is why we built RideCheck.		
488:22	"This technology lets us detect if		
488:23	anything unexpected comes up during your ride.		
488:24	"If this happens, we'll immediately check		
488:25	in through the app to ensure everything is okay."		
489:01	Do you see that?		
489:02	A. I do, yeah.		
489:03	Q. In fact, there are concerns about why		
489:04	RideCheck doesn't -- didn't trigger earlier in		
489:05	certain cases, right?		
489:06	A. Yes, I see that.		
489:07	Q. Why it didn't escalate actions, right?		
489:08	A. Yes.		
489:09	Q. Why it chose not to act at all, right?		
489:10	A. Yes.		
489:11	Q. Okay. And, again, both of these		
489:12	documents are from 2024, right?		
489:13	A. Yes, they're both from 2024.		
489:14	Q. The black one, people outside the company		
489:15	saw; the white one, until today, people haven't		
489:16	seen, right?		
489:17	A. Yes, because it's an internal document		
489:18	that is working through optimizations and work that		
489:19	the team can do to understand, like it said, the		

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DESIGNATION	SOURCE	DURATION	ID
	489:20 baseline of the way that RideCheck works.		
590:08 - 590:14	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:24	RE_v4p.133
	590:08 Q. do you recall raising some concerns (edited)		
	590:09 about the fact that while you all talk about		
	590:10 bringing women's safety to the forefront in -- in		
	590:11 your work at Uber, that often, nothing really		
	590:12 happens?		
	590:13 A. I don't remember saying that		
	590:14 specifically, so I don't --		
591:17 - 591:18	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:04	RE_v4p.134
	591:17 Q. And what does "PCM" stand for?		
	591:18 A. Policy, comms and marketing.		
600:04 - 600:05	Ross, Elizabeth 2025-06-12 - WIT MP4	00:00:06	RE_v4p.135
	600:04 MS. WALSH: Let's take a look at what		
	600:05 we're going to mark as --		
600:07 - 600:07	Ross, Elizabeth 2025-06-12 - WIT MP4	00:00:01	RE_v4p.136
	600:07 MS. WALSH: -- 1087.		
601:11 - 602:11	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:50	RE_v4p.137
	601:11 Q. Okay. And if you look below, it says		
	601:12 "Lizzie Ross mentioned you in a comment in the		
	601:13 following document," right?		
	601:14 A. Yes.		
	601:15 Q. "Safety PCM 2022 Plan," right?		
	601:16 A. Yes.		
	601:17 Q. And Cande, who is on your team, says,		
	601:18 "Re: Gap in product offerings; no WRP in US, no		
	601:19 other innovative features on the roadmap now."		
	601:20 Do you see that?		
	601:21 A. Uh-huh.		
	601:22 Q. So it's talking about product offerings,		
	601:23 right?		
	601:24 A. Yes.		
	601:25 Q. And "WRP" -- and a gap in product		
	602:01 offerings, right?		
	602:02 A. Yeah, that's what it says.		
	602:03 Q. And "WRP" is women rider preferred,		
	602:04 right?		
	602:05 A. Women Rider Preference, yes.		
	602:06 Q. Women Rider Preference.		

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	602:07 Okay. And you respond below, and you're		
	602:08 responding to Emilie Boman, right?		
	602:09 A. Uh-huh.		
	602:10 Q. And Nick Silver, right?		
	602:11 A. Uh-huh.		
602:15 - 603:08	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:43	RE_v4p.138
	602:15 Q. (By Ms. Walsh) You say, "We continue to		
	602:16 bring women's safety to the top of our plans every		
	602:17 year, yet nothing really happens with it when we		
	602:18 realize we still don't have a strong enough leg to		
	602:19 stand on when it comes to product offerings."		
	602:20 Do you see that?		
	602:21 A. Uh-huh.		
	602:22 Q. You go on to say, "If we aren't able to		
	602:23 get product to prioritize WRP expansions or new		
	602:24 women-specific feature offerings, do we still want		
	602:25 to try and make women's safety a large		
	603:01 moment/priority in 2022?"		
	603:02 Do you see that?		
	603:03 A. Yes.		
	603:04 Q. And you say, "Food for thought since we		
	603:05 seem to hit this same barrier every year."		
	603:06 A. Yes.		
	603:07 Q. Do you see that?		
	603:08 A. Uh-huh.		
603:20 - 604:13	Ross, Elizabeth 2025-06-12 - PIP MP4	00:00:39	RE_v4p.139
	603:20 Q. (By Ms. Walsh) What you say is, "We		
	603:21 continue to bring women's safety to the top of our		
	603:22 plans every year" --		
	603:23 A. Uh-huh.		
	603:24 Q. -- "yet nothing really happens with it,"		
	603:25 right?		
	604:01 A. Yes.		
	604:02 Q. And you say, "when we realize we still		
	604:03 don't have a strong enough leg to stand on when it		
	604:04 comes to product offerings," right?		
	604:05 A. Yes.		
	604:06 Q. And below, you say, "Do we still want to		
	604:07 try and make women's safety a large moment/priority		
	604:08 in 2022?"		

RE_v4p - ROSS, ELIZABETH - v04p_ As-Played in Court 01/14-15/2026

DESIGNATION	SOURCE	DURATION	ID
	604:09 A. Yes.		
	604:10 Q. Those were the words that you wrote on		
	604:11 these internal comments to your colleagues back in		
	604:12 2022, right?		
	604:13 A. Uh-huh.		
605:02 - 606:04	Ross, Elizabeth 2025-06-12 - WIT MP4	00:01:22	RE_v4p.140
	605:02 Q. -- what are you talking about here, and		
	605:03 can you explain what's going on in this document?		
	605:04 A. Yeah.		
	605:05 So the document itself that we looked at		
	605:06 before was the policy, comms and marketing 2022		
	605:07 proposed plans.		
	605:08 The comments here look like, as -- before		
	605:09 we finalize the plans itself, we're kind of working		
	605:10 through them and figuring out if women's safety is		
	605:11 something that we should be including as one of our		
	605:12 key priorities for 2022.		
	605:13 My comment is -- here is saying that we		
	605:14 continue to talk about women's safety in our plans		
	605:15 every year when it comes to policy, comms and		
	605:16 marketing; and yet, unfortunately, policy, comms		
	605:17 and marketing maybe isn't necessarily doing a huge		
	605:18 campaign around it due to the fact that there might		
	605:19 not be enough product offerings that can make a		
	605:20 campaign shine.		
	605:21 I didn't write it in that way, but that's		
	605:22 what this comment is ultimately implying.		
	605:23 And a big piece of that puzzle is Women		
	605:24 Rider Preference, which is a product that I think		
	605:25 will and does mean a lot to women, that's live in		
	606:01 other places around -- around the world. And so I		
	606:02 think knowing that there were unknown plans for		
	606:03 that expansion, I was questioning if it should be a		
	606:04 priority within our plans.		

PLF Affirmative	01:01:32
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DEF Counter	00:11:58
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TOTAL RUN TIME	01:13:29
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