

# **COURT EXHIBIT 8A**

Designation Run Reports for Sunny Wong  
as played in Court 1/21/2026 (June 25, 2025, July 23, 2025, October 14,  
2025)

# Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

## Designation List Report

 <b>Wong, Sunny</b>	<b>2025-06-25</b>
<b>Wong, Sunny</b>	<b>2025-06-25</b>

PLF Affirmative	00:22:42
DEF Counter	00:03:09
<b>TOTAL RUN TIME</b>	<b>00:25:52</b>



## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
9:13 - 9:15	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 9:13 Q. Mr. Wong, would you please state your full 9:14 name? 9:15 A. My name is Sunny Wong.	00:00:05	<b>WS625_v10p-As-PlayedinCourt1-21-26.1</b>
20:25 - 21:03	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 20:25 What is your current title (edited) 21:01 at Uber? 21:02 A. My current title is a Senior Applied 21:03 Science Manager.	00:00:07	<b>WS625_v10p-As-PlayedinCourt1-21-26.2</b>
22:02 - 22:05	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 22:02 Q. Since you started at Uber, has it been 22:03 your mission to improve safety on the Uber platform? 22:04 A. When I joined, my focus was to improve 22:05 safety on the platform, and continues to be that.	00:00:12	<b>WS625_v10p-As-PlayedinCourt1-21-26.3</b>
26:07 - 26:10	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 26:07 Q. So is it true that most of your team's 26:08 work is focused on preventing sexual assault, sexual 26:09 misconduct, and physical assault? 26:10 A. Correct.	00:00:07	<b>WS625_v10p-As-PlayedinCourt1-21-26.4</b>
27:11 - 27:14	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 27:11 Q. Okay. I'd like to shift to talking about 27:12 S-RAD and kind of overall what that is. "S-RAD" 27:13 stands for "Safety Risk Assessed Dispatch," right? 27:14 A. Right.	00:00:15	<b>WS625_v10p-As-PlayedinCourt1-21-26.5</b>
27:15 - 27:20	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 27:15 Q. And S-RAD is a program that Uber developed 27:16 to take risk of sexual assault into account when it 27:17 makes dispatch decisions, right? 27:18 A. The goal of S-RAD was to create a safety 27:19 feature with the goal of reducing the rate of sexual 27:20 assaults and sexual misconducts.	00:00:18	<b>WS625_v10p-As-PlayedinCourt1-21-26.6</b>
30:19 - 30:23	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 30:19 Q. The goal of S-RAD is to reduce actual	00:00:16	<b>WS625_v10p-As-PlayedinCourt1-21-26.7</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	30:20 sexual assaults on the Uber platform, right?		
	30:21 A. The goal is to reduce the sexual -- rate		
	30:22 of sexual assaults on the platform, and we leverage		
	30:23 reporting data.		
31:07 - 31:08	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:00	<b>WS625_v10p-As-PlayedinCourt1-21-26.8</b>
	31:07 (Whereupon Exhibit 1239 was marked for		
	31:08 identification.)		
32:09 - 32:16	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:23	<b>WS625_v10p-As-PlayedinCourt1-21-26.9</b>
	32:09 Q. So looking at Page 2 of Exhibit 1239, this		
	32:10 is a PowerPoint presentation titled "S-RAD		
	32:11 Performance Overview," dated November 2018. Do you		
	32:12 see that?		
	32:13 A. I do.		
	32:14 Q. This was during the time period when S-RAD		
	32:15 was just being initially studied, right?		
	32:16 A. I believe that was the case, yep.		
32:19 - 32:23	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:23	<b>WS625_v10p-As-PlayedinCourt1-21-26.10</b>
	32:19 Q. Turning to Page 5 of Exhibit 1239. The		
	32:20 motivation behind S-RAD was to reduce sexual		
	32:21 assaults on the Uber platform, right?		
	32:22 A. I see that Sunny Jeon has written that on		
	32:23 this slide, yes.		
33:11 - 33:14	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:09	<b>WS625_v10p-As-PlayedinCourt1-21-26.11</b>
	33:11 Q. And the way that S-RAD does that is by		
	33:12 identifying and preventing driver-rider matches with		
	33:13 elevated risk, right?		
	33:14 A. Correct.		
33:18 - 33:23	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:20	<b>WS625_v10p-As-PlayedinCourt1-21-26.12</b>
	33:18 Q. Other than S-RAD, is there anything		
	33:19 else -- are there any other safety programs that		
	33:20 Uber uses to try to reduce the risk of sexual		
	33:21 assault with respect to its dispatch or driver-rider		
	33:22 matches?		
	33:23 A. I'm not aware of any.		

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
34:12 - 34:13	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 34:12 (Whereupon Exhibit 1240 was marked for 34:13 identification.)	00:00:00	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.13</b>
35:01 - 35:11	<b>Wong, Sunny 2025-06-25 - WIT MP4</b> 35:01 of the actual document, this is a document dated 35:02 July 2018, titled "S-RAD Model Overview," authored 35:03 by Sunny Jeon, right? 35:04 A. Correct. 35:05 Q. And if we look under the header that says 35:06 "Summary" on that page, it says, "To support Uber's 35:07 company-wide priority to reduce critical safety 35:08 incidents, the Safety & Insurance team has developed 35:09 a data-driven intervention for preventing sexual 35:10 assaults." Do you see that? 35:11 A. I do see that.	00:00:41	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.14</b>
36:01 - 36:10	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 36:01 Q. Under the next bullet point, "Main 36:02 results," it says, "S-RAD may represent Uber's most 36:03 effective intervention for preventing sexual 36:04 assaults." Do you see that? 36:05 A. I do see that, yeah. I mean, that's Sunny 36:06 Jeon's framing of what he thought this potentially 36:07 could be. 36:08 Q. And was Sunny Jeon a data scientist who 36:09 was working on the safety area at Uber? 36:10 A. He was.	00:00:32	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.15</b>
40:22 - 41:07	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 40:22 Q. If you look at the first sentence there, 40:23 it says, "The S-RAD model leverages a variety of 40:24 trip, driver, and rider-level predictors to detect 40:25 driver-rider matches with elevated risk of sexual 41:01 assaults." Do you see that? 41:02 A. I do see that on the document. 41:03 Q. Where this 2018 S-RAD document is talking 41:04 about predictors, is that the same thing that you're 41:05 referring to as "inputs" or "features"?	00:00:38	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.16</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	41:06 A. Yeah, it looks like they use it pretty 41:07 interchangeably.		
43:11 - 43:12	<b>Wong, Sunny 2025-06-25 - WIT MP4</b>	00:00:08	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.17</b>
	43:11 So just for the record, Exhibit 1239 is		
	43:12 Bates number ending in 2266899. (edited)		
43:16 - 43:22	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:18	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.18</b>
	43:16 Q. The title of this slide is "Prevention		
	43:17 Strategy: Risk Signals." Do you see that?		
	43:18 A. I do see it.		
	43:19 Q. The first bullet point says, "Sexual		
	43:20 assaults are rare and appear unpredictable, but many		
	43:21 have risk signals." Do you see that?		
	43:22 A. I do see that.		
44:04 - 44:09	<b>Wong, Sunny 2025-06-25 - WIT MP4</b>	00:00:20	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.19</b>
	44:04 Q. Uber looks to inputs or features in order		
	44:05 to try to signal risk, right?		
	44:06 A. I mean, we continuously conduct analysis		
	44:07 to help provide insights to help continually improve		
	44:08 the S-RAD model. So that's just part of the work we		
	44:09 do.		
47:03 - 47:06	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:14	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.20</b>
	47:03 Q. The question is, "Can these risk signals		
	47:04 be leveraged to better anticipate and prevent sexual		
	47:05 assaults?" Do you see where I'm reading from?		
	47:06 A. I am able to see that. (edited)		
47:20 - 47:22	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:06	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.21</b>
	47:20 Q. And once S-RAD was developed, the (edited)		
	47:21 answer to the question here turned out to be "yes,"		
	47:22 right?		
47:24 - 47:24	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:02	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.22</b>
	47:24 THE WITNESS: Correct.		
49:03 - 49:04	<b>Wong, Sunny 2025-06-25 - WIT MP4</b>	00:00:07	<b>WS625_v10p-As- PlayedinCourt1-2</b>
	49:03 Q. Is Uber able to effectively predict the		

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	49:04 risk of sexual assault for driver trip pairings?		
49:06 - 49:11	<b>Wong, Sunny 2025-06-25 - WIT MP4</b>	00:00:17	<b>WS625_v10p-As-PlayedinCourt1-21-26.24</b>
	49:06 THE WITNESS: No. We try our best to --		
	49:07 again, sexual assaults on the platform are		
	49:08 extremely, extremely rare. And we are not able to		
	49:09 predict with reasonable confidence given the rarity		
	49:10 of such events. Again, we try our best with		
	49:11 investing in things like S-RAD.		
58:05 - 58:06	<b>Wong, Sunny 2025-06-25 - WIT MP4</b>	00:00:00	<b>WS625_v10p-As-PlayedinCourt1-21-26.25</b>
	58:05 (Whereupon Exhibit 1241 was marked for		
	58:06 identification.)		
60:16 - 60:24	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:33	<b>WS625_v10p-As-PlayedinCourt1-21-26.26</b>
	60:16 Q. As the person that Uber designated to		
	60:17 speak on its behalf about S-RAD, is S-RAD an		
	60:18 effective product for reducing sexual assault and		
	60:19 sexual misconduct incidents?		
	60:20 A. Yes.		
	60:21 Q. It's resulted in a statistically		
	60:22 significant reduction in rates of serious sexual		
	60:23 assault and sexual misconduct, right?		
	60:24 A. Based on data I've seen, yes.		
68:16 - 68:18	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:08	<b>WS625_v10p-As-PlayedinCourt1-21-26.27</b>
	68:16 "Is 15 to 18% recall the ceiling for the (edited)		
	68:17 model?" Do you see that?		
	68:18 A. I'm able to see that.		
69:16 - 69:22	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:16	<b>WS625_v10p-As-PlayedinCourt1-21-26.28</b>
	69:16 First, in this 2018 S-RAD document authored (edited)		
	69:17 by Mr. Jeon, "recall" is defined as "percent of		
	69:18 sexual assaults correctly anticipated." Do you see		
	69:19 that?		
	69:20 A. He's defined it in his document.		
	69:21 Q. Is that a "yes"?		
	69:22 A. Yes.		
123:11 - 123:14	<b>Wong, Sunny 2025-06-25 - WIT MP4</b>	00:00:10	<b>WS625_v10p-As-</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	123:11 Q. But there are some trips that are (edited)		<b>PlayedinCourt1-2 1-26.29</b>
	123:12 identified by S-RAD as being high risk that Uber		
	123:13 still dispatches, right?		
	123:14 A. Correct.		
123:22 - 123:24	<b>Wong, Sunny 2025-06-25 - WIT MP4</b>	00:00:09	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.30</b>
	123:22 Q. I'm going to give you what is marked		
	123:23 previously as Exhibit 889 to the Michael Akamine		
	123:24 deposition.		
128:06 - 128:10	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:13	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.31</b>
	128:06 Q. you're aware (edited)		
	128:07 that the way that S-RAD is set up and designed, some		
	128:08 of the trips that are flagged as risky are		
	128:09 dispatched and an incident occurs; true?		
	128:10 A. Correct.		
128:19 - 129:04	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:35	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.32</b>
	128:19 Q. - whoever put this comment in the (edited)		
	128:20 notes on this slide says, "Policy view: Concern is		
	128:21 that if in the future, we have to disclose		
	128:22 information on this, how we explain or justify we		
	128:23 had the information that it was a high-risk trip but		
	128:24 we still match it and we even send a nudge to those		
	128:25 involved, and a very bad incident happened. From my		
	129:01 perspective, it will be" -- I think that means "hard		
	129:02 to explain that to the public, government officials,		
	129:03 et cetera." Do you see where I'm reading from?		
	129:04 A. I do see where you're reading from.		
129:13 - 129:15	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:09	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.33</b>
	129:13 Q. Have you been concerned about running		
	129:14 S-RAD that way, where trips are dispatched that Uber		
	129:15 knows are high risk?		
129:17 - 129:17	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:01	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.34</b>
	129:17 THE WITNESS: I don't have that concern,		
130:02 - 130:04	<b>Wong, Sunny 2025-06-25 - WIT MP4</b>	00:00:14	<b>WS625_v10p-As-</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	130:02 Has your Data Analysis or Data Science team ever		<b>PlayedinCourt1-2</b>
	130:03 discussed changing S-RAD where the highest risk		<b>1-26.35</b>
	130:04 trips just aren't dispatched?		
130:06 - 130:08	<b>Wong, Sunny 2025-06-25 - WIT MP4</b>	00:00:05	<b>WS625_v10p-As-</b>
	130:06 THE WITNESS: I don't recall those		<b>PlayedinCourt1-2</b>
	130:07 conversations, but there might be other teams that		<b>1-26.36</b>
	130:08 have discussed that.		
131:11 - 131:20	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:29	<b>WS625_v10p-As-</b>
	131:11 All right. I want to talk about the words		<b>PlayedinCourt1-2</b>
	131:12 "safety risk assessed dispatch" or "S-RAD" a little		<b>1-26.37</b>
	131:13 bit more. So the last word in that title for the		
	131:14 program is the word "dispatch," right?		
	131:15 A. Correct.		
	131:16 Q. And that's something that Uber does, is it		
	131:17 when it receives a ride request, it pairs a		
	131:18 particular driver to that ride request, and it		
	131:19 dispatches that driver, right?		
	131:20 A. That's correct.		
131:21 - 131:21	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:03	<b>WS625_v10p-As-</b>
	131:21 MS. PETERS: Can we go to Document 68,		<b>PlayedinCourt1-2</b>
			<b>1-26.38</b>
131:22 - 131:23	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:10	<b>WS625_v10p-As-</b>
	131:22 please. This has been previously marked as		<b>PlayedinCourt1-2</b>
	131:23 Exhibit 546 to the Silver deposition. For the		<b>1-26.39</b>
131:24 - 131:25	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:10	<b>WS625_v10p-As-</b>
	131:24 record, this is a document starting with Bates		<b>PlayedinCourt1-2</b>
	131:25 No. UBER_JCCP_MDL_541461. And for the record, it's		<b>1-26.40</b>
132:01 - 132:02	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:12	<b>WS625_v10p-As-</b>
	132:01 a 2019 or 2020, from the metadata, looks like a		<b>PlayedinCourt1-2</b>
	132:02 PowerPoint related to S-RAD.		<b>1-26.41</b>
132:23 - 132:23	<b>Wong, Sunny 2025-06-25 - WIT MP4</b>	00:00:11	<b>WS625_v10p-As-</b>
	132:23 Q. Okay. If we go to the fifth page of the		<b>PlayedinCourt1-2</b>
			<b>1-26.42</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
132:24 - 133:06	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 132:24 document that ends in 464. This has a nice picture 132:25 for us of, looks like, a rider and some different 133:01 vehicles. And it says, "Every time a rider requests 133:02 a ride, there are multiple potential drivers that 133:03 they can be matched with." Right? 133:04 A. I'm able to see that, yes, it refers to 133:05 the driver-rider supply plans we talked about 133:06 earlier, yep.	00:00:22	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.43</b>
134:17 - 134:20	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 134:17 Q. is Uber, when it makes (edited) 134:18 pairing decisions, taking safety into account? 134:19 A. As far as leveraging S-RAD as that safety 134:20 component, correct, yes.	00:00:11	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.44</b>
135:12 - 135:21	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 135:12 Q. The rider does not select from the 135:13 available different drivers which driver to choose, 135:14 right? 135:15 A. That's correct, because there's -- there 135:16 are multiple drivers that might be available that 135:17 will fit that criteria for that particular trip 135:18 request. 135:19 Q. And that's -- so the choice of which 135:20 driver to match is a choice Uber makes, right? 135:21 A. Correct.	00:00:22	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.45</b>
135:22 - 135:24	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 135:22 Q. And Uber knows that the riders are 135:23 trusting Uber to make safe decisions about which 135:24 driver to pair them with, right?	00:00:08	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.46</b>
136:01 - 136:02	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 136:01 THE WITNESS: I don't know what riders are 136:02 expecting for a given trip request.	00:00:04	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.47</b>
137:15 - 137:16	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 137:15 Q. You know that the riders have little	00:00:07	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.48</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
137:18 - 137:20	137:16 control over who they are paired with, right? <b>Wong, Sunny 2025-06-25 - PIP MP4</b> 137:18 THE WITNESS: They are not able to choose 137:19 which driver of all the different plans that are 137:20 available.	00:00:05	<b>WS625_v10p-As-PlayedinCourt1-21-26.49</b>
137:22 - 137:24	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 137:22 Q. Right. And they don't control who Uber 137:23 pairs them with, right? 137:24 A. Correct.	00:00:04	<b>WS625_v10p-As-PlayedinCourt1-21-26.50</b>
139:14 - 139:17	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 139:14 Q. Would you agree that Uber has a 139:15 responsibility to do everything that it can to not 139:16 dispatch drivers who are going to sexually assault 139:17 riders?	00:00:10	<b>WS625_v10p-As-PlayedinCourt1-21-26.51</b>
139:19 - 139:24	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 139:19 THE WITNESS: S-RAD does not have -- S-RAD 139:20 assesses risks at the pair- -- rider-driver pairing 139:21 level. It does not have -- it doesn't score 139:22 user-level risks. So we don't have that visibility 139:23 in terms of, at the user level, which driver is what 139:24 you define as risky, right.	00:00:20	<b>WS625_v10p-As-PlayedinCourt1-21-26.52</b>
191:10 - 191:13	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 191:10 Q. Do you agree that Uber should do whatever 191:11 it can to not make driver trip pairings that carry 191:12 an increased risk of sexual assault? 191:13 A. Yes.	00:00:11	<b>WS625_v10p-As-PlayedinCourt1-21-26.53</b>
149:07 - 149:13	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 149:07 is it true that (edited) 149:08 S-RAD scores potential pairings based on the risk of 149:09 sexual assault or sexual misconduct for each 149:10 pairing? 149:11 A. Yes. 149:12 Q. And it assigns each pairing a number	00:00:29	<b>WS625_v10p-As-PlayedinCourt1-21-26.54</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	149:13 between 0 and 1 to reflect that risk, right?		
149:15 - 149:16	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:04	<b>WS625_v10p-As-PlayedinCourt1-21-26.55</b>
	149:15 THE WITNESS: That's the range of the		
	149:16 scores that come out of S-RAD.		
149:18 - 149:22	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:09	<b>WS625_v10p-As-PlayedinCourt1-21-26.56</b>
	149:18 Q. Is that a "yes"?		
	149:19 A. Correct.		
	149:20 Q. Is 1 reflecting higher risk, and 0 is		
	149:21 lower risk?		
	149:22 A. Correct.		
156:12 - 156:14	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:09	<b>WS625_v10p-As-PlayedinCourt1-21-26.57</b>
	156:12 Q. Right, but in terms of actual rates of		
	156:13 sexual assault, what -- what rate of sexual assault		
	156:14 is acceptable to Uber?		
156:16 - 156:17	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:04	<b>WS625_v10p-As-PlayedinCourt1-21-26.58</b>
	156:16 THE WITNESS: There's nothing like that		
	156:17 that's been established, right.		
157:11 - 157:14	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:08	<b>WS625_v10p-As-PlayedinCourt1-21-26.59</b>
	157:11 You're here to (edited)		
	157:12 testify about the risk-sensitive dispatching or		
	157:13 S-RAD. That's one of the topics you're here on		
	157:14 Uber's behalf about, right?		
157:16 - 157:16	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:01	<b>WS625_v10p-As-PlayedinCourt1-21-26.60</b>
	157:16 THE WITNESS: Correct.		
157:18 - 157:24	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:13	<b>WS625_v10p-As-PlayedinCourt1-21-26.61</b>
	157:18 Q. And one of the things Uber does with		
	157:19 S-RAD -- we've talked about this -- is that it		
	157:20 chooses where to set the trigger rate, like which		
	157:21 rides to act on based on their risk level for sexual		
	157:22 assault, right?		
	157:23 A. Yes. A trigger rate needs to be set for		
	157:24 S-RAD.		

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
158:13 - 158:25	<p><b>Wong, Sunny 2025-06-25 - PIP MP4</b></p> <p>158:13 Q. And that top 1.25%, Uber takes some</p> <p>158:14 action, right?</p> <p>158:15 A. Well, it tries to, again, downrank some</p> <p>158:16 plans, right, with a goal of potentially reducing</p> <p>158:17 the probability of certain plans from getting</p> <p>158:18 dispatched.</p> <p>158:19 Q. That's a kind of action, right?</p> <p>158:20 A. Correct.</p> <p>158:21 Q. And for the rest of the rides that are</p> <p>158:22 below that 1.25% trigger rate, Uber does not take</p> <p>158:23 some action through S-RAD, right?</p> <p>158:24 A. Correct. We do not downrank those plans</p> <p>158:25 or trips.</p>	00:00:28	<b>WS625_v10p-As-PlayedinCourt1-21-26.62</b>
159:01 - 159:05	<p><b>Wong, Sunny 2025-06-25 - PIP MP4</b></p> <p>159:01 Q. And so in deciding where to put the (edited)</p> <p>159:02 trigger rate, did Uber make a decision about what</p> <p>159:03 level of risk for sexual assault was acceptable to</p> <p>159:04 Uber?</p> <p>159:05 A. Not that I know (edited)</p>	00:00:15	<b>WS625_v10p-As-PlayedinCourt1-21-26.63</b>
159:09 - 159:12	<p><b>Wong, Sunny 2025-06-25 - PIP MP4</b></p> <p>159:09 Q. And do you know whether for the top 1.25%</p> <p>159:10 of trips, whether the risk is, you know, five times</p> <p>159:11 the average, ten times average, 100 times average,</p> <p>159:12 1,000 times average? Do you have any idea?</p>	00:00:16	<b>WS625_v10p-As-PlayedinCourt1-21-26.64</b>
159:15 - 159:15	<p><b>Wong, Sunny 2025-06-25 - PIP MP4</b></p> <p>159:15 THE WITNESS: I don't know.</p>	00:00:02	<b>WS625_v10p-As-PlayedinCourt1-21-26.65</b>
165:07 - 165:08	<p><b>Wong, Sunny 2025-06-25 - PIP MP4</b></p> <p>165:07 (Whereupon Exhibit 1247 was marked for</p> <p>165:08 identification.)</p>	00:00:00	<b>WS625_v10p-As-PlayedinCourt1-21-26.66</b>
166:03 - 166:10	<p><b>Wong, Sunny 2025-06-25 - PIP MP4</b></p> <p>166:03 you see at the top of Page 12 it says "Insight</p> <p>166:04 No. 3, "Sexual assaults are generally concentrated</p> <p>166:05 to late-night, weekend hours"?</p>	00:00:19	<b>WS625_v10p-As-PlayedinCourt1-21-26.67</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	166:06 A. I see that title.		
	166:07 Q. And this is, if we look at the first page,		
	166:08 from an Uber document from June of 2018. Do you see		
	166:09 that on the metadata sheet?		
	166:10 A. Yes.		
168:04 - 168:05	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:03	<b>WS625_v10p-As-PlayedinCourt1-21-26.68</b>
	168:04 THE WITNESS: I do see those left two bars		
	168:05 are higher.		
168:19 - 168:22	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:08	<b>WS625_v10p-As-PlayedinCourt1-21-26.69</b>
	168:19 Q. And do you have any contrary information		
	168:20 that rates of sexual assault are actually not		
	168:21 elevated during nighttime hours?		
	168:22 A. I do not.		
168:23 - 168:23	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:06	<b>WS625_v10p-As-PlayedinCourt1-21-26.70</b>
	168:23 Q. And then let's go back to Exhibit 1239.		
169:12 - 169:15	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:11	<b>WS625_v10p-As-PlayedinCourt1-21-26.71</b>
	169:12 he says, "In the U.S.," first sub-bullet (edited)		
	169:13 point, "Sexual assault rate is greater than 5 times		
	169:14 between 12 to 3 am." Do you see that?		
	169:15 A. I do see that.		
176:16 - 177:12	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:44	<b>WS625_v10p-As-PlayedinCourt1-21-26.72</b>
	176:16 Q. So at least in 2018 -- we don't know		
	176:17 exactly what a bar area is, but at that point, based		
	176:18 on whatever study Uber had done, it was aware that		
	176:19 high-risk trips tend to originate from a bar area,		
	176:20 right?		
	176:21 A. Yeah, without pulling the details of his		
	176:22 analysis, that seems to be what Sunny Jeon found to		
	176:23 be one of the insights.		
	176:24 Q. Right. And he worked for Uber at the		
	176:25 time, right?		
	177:01 A. Correct.		
	177:02 Q. We talked about it earlier, but he worked		
	177:03 in Data Science, in the safety area, right?		
	177:04 A. Correct.		

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	177:05 Q. And so he was looking for insights from 177:06 Uber's data, right? 177:07 A. Correct. 177:08 Q. And this is one of the insights that he 177:09 was -- he was finding on behalf of Uber that 177:10 high-risk trips tend to originate from a bar area, 177:11 right? 177:12 A. Yeah.		
203:12 - 203:12	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 203:12 Q. Let's go to Page -- Exhibit 1239. (edited)	00:00:04	<b>WS625_v10p-As-PlayedinCourt1-21-26.73</b>
203:13 - 203:17	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 203:13 In 2018, Uber found from its data that L3 sexual 203:14 assaults were committed by males 86% of the time. 203:15 Do you see that? 203:16 A. I see that. It's a table of sexual 203:17 assaults reported against a particular gender.	00:00:21	<b>WS625_v10p-As-PlayedinCourt1-21-26.74</b>
204:07 - 204:10	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 204:07 Q. And sexual assaults are reported against 204:08 men for L4 sexual assaults 96% of the time, right? 204:09 A. Correct. At least on the table, that's 204:10 what it says.	00:00:14	<b>WS625_v10p-As-PlayedinCourt1-21-26.75</b>
207:05 - 207:06	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 207:05 (Whereupon Exhibit 1249 was marked for 207:06 identification.)	00:00:00	<b>WS625_v10p-As-PlayedinCourt1-21-26.76</b>
207:08 - 207:08	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 207:08 Q. I'm handing you what I marked as 1249.	00:00:03	<b>WS625_v10p-As-PlayedinCourt1-21-26.77</b>
207:09 - 207:12	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 207:09 The metadata indicate it's a document from 2017. 207:10 First page to the second page is titled "Sexual 207:11 Assaults: Trends + Correlates," again, from Sunny 207:12 Jeon.	00:00:15	<b>WS625_v10p-As-PlayedinCourt1-21-26.78</b>
207:18 - 207:18	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 207:18 Q. If you could go to Page 6. The last line	00:00:06	<b>WS625_v10p-As-PlayedinCourt1-21-26.79</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
207:19 - 207:23	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 207:19 of the first paragraph under "Effect of Gender." 207:20 "Trips that ended in sexual assaults are 2.27 times 207:21 more likely to have a driver and rider of different 207:22 genders." Do you see that? 207:23 A. I do see that.	00:00:16	<b>WS625_v10p-As-PlayedinCourt1-21-26.80</b>
207:24 - 207:24	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 207:24 Q. Has Uber told that to its riders?	00:00:06	<b>WS625_v10p-As-PlayedinCourt1-21-26.81</b>
208:01 - 208:01	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 208:01 THE WITNESS: I'm not aware.	00:00:02	<b>WS625_v10p-As-PlayedinCourt1-21-26.82</b>
210:03 - 210:05	<b>Wong, Sunny 2025-06-25 - WIT MP4</b> 210:03 Q. Should people who are riding with Uber be 210:04 able to make fully informed decisions about whether 210:05 to take a trip with Uber?	00:00:08	<b>WS625_v10p-As-PlayedinCourt1-21-26.83</b>
210:07 - 210:11	<b>Wong, Sunny 2025-06-25 - WIT MP4</b> 210:07 THE WITNESS: How do you define "fully 210:08 informed"? 210:09 BY MS. PETERS: 210:10 Q. Where they have all the relevant risk 210:11 information.	00:00:05	<b>WS625_v10p-As-PlayedinCourt1-21-26.84</b>
210:13 - 210:16	<b>Wong, Sunny 2025-06-25 - WIT MP4</b> 210:13 THE WITNESS: I'm not sure what riders are 210:14 expecting on a given trip request or expectations 210:15 or, you know, what they were expecting, again, on 210:16 the trip.	00:00:09	<b>WS625_v10p-As-PlayedinCourt1-21-26.85</b>
211:18 - 211:20	<b>Wong, Sunny 2025-06-25 - WIT MP4</b> 211:18 Q. When Uber is aware that a driver has a 211:19 prior sexual misconduct report, does Uber share that 211:20 information with riders?	00:00:09	<b>WS625_v10p-As-PlayedinCourt1-21-26.86</b>
211:22 - 211:22	<b>Wong, Sunny 2025-06-25 - WIT MP4</b> 211:22 THE WITNESS: Not that I know of.	00:00:02	<b>WS625_v10p-As-PlayedinCourt1-21-26.87</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
212:16 - 212:24	<p><b>Wong, Sunny 2025-06-25 - WIT MP4</b></p> <p>212:16 Q. Uber could have decided to block certain pairings, right?</p> <p>212:17 pairings, right?</p> <p>212:18 A. Again, what we referred to earlier, we wouldn't have reasonable confidence on what might happen on a particular plan, for example, right.</p> <p>212:20 For us to block the plan, again, we will eventually reduce our ability to provide reliable and safe matching transportation service for that particular trip request.</p> <p>212:21</p> <p>212:22</p> <p>212:23</p> <p>212:24</p>	00:00:23	<b>WS625_v10p-As-PlayedinCourt1-21-26.88</b>
212:25 - 213:03	<p><b>Wong, Sunny 2025-06-25 - WIT MP4</b></p> <p>212:25 Q. How does Uber know if it's gone as far as it can in trying to block rides or prevent rides that have a heightened probability of sexual assault?</p> <p>213:01</p> <p>213:02</p> <p>213:03</p>	00:00:10	<b>WS625_v10p-As-PlayedinCourt1-21-26.89</b>
213:05 - 213:05	<p><b>Wong, Sunny 2025-06-25 - WIT MP4</b></p> <p>213:05 THE WITNESS: I do not know.</p>	00:00:03	<b>WS625_v10p-As-PlayedinCourt1-21-26.90</b>
214:03 - 214:05	<p><b>Wong, Sunny 2025-06-25 - WIT MP4</b></p> <p>214:03 Q. How much confidence does Uber need that the risk of sexual assault is elevated before it will block a pairing?</p> <p>214:04</p> <p>214:05</p>	00:00:08	<b>WS625_v10p-As-PlayedinCourt1-21-26.91</b>
214:07 - 214:07	<p><b>Wong, Sunny 2025-06-25 - WIT MP4</b></p> <p>214:07 THE WITNESS: We've never discussed that.</p>	00:00:03	<b>WS625_v10p-As-PlayedinCourt1-21-26.92</b>
217:16 - 217:16	<p><b>Wong, Sunny 2025-06-25 - PIP MP4</b></p> <p>217:16 THE WITNESS: Not that I know of.</p>	00:00:02	<b>WS625_v10p-As-PlayedinCourt1-21-26.93</b>
218:12 - 218:16	<p><b>Wong, Sunny 2025-06-25 - PIP MP4</b></p> <p>218:12 Mr. Jeon says that, "Sexual assaults caused by drivers are nearly 3 times more likely to be caused by a driver with a 1-star rate greater than the mean." Do you see that?</p> <p>218:13</p> <p>218:14</p> <p>218:15</p> <p>218:16 A. I do see that.</p>	00:00:09	<b>WS625_v10p-As-PlayedinCourt1-21-26.94</b>
219:22 - 219:24	<p><b>Wong, Sunny 2025-06-25 - PIP MP4</b></p>	00:00:11	<b>WS625_v10p-As-</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	219:22 Q. When Uber pairs a rider with a driver who		<b>PlayedinCourt1-2 1-26.95</b>
	219:23 has a 1-star rate greater than the mean, does it		
	219:24 tell the rider that?		
220:01 - 220:01	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:02	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.96</b>
	220:01 THE WITNESS: Not that I know of.		
220:22 - 221:02	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:17	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.97</b>
	220:22 Q. The last item on the list is "A report of		
	220:23 sexual assault is 1.2 times more likely if rider or		
	220:24 driver had fewer than 20 lifetime trips," right?		
	220:25 A. I'm able to see that in the doc, yes.		
	221:01 Q. You said you see that in the document?		
	221:02 A. Yes.		
221:05 - 221:07	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:12	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.98</b>
	221:05 Q. And then going to Exhibit 1240. That's		
	221:06 the Sunny Jeon July 2018 S-RAD Model Overview,		
	221:07 page 10. Do you see this Table 2 titled "Predictors		
221:08 - 221:10	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:13	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.99</b>
	221:08 of Sexual Assaults"?		
	221:09 A. Yep, I see the table broken out by trip		
	221:10 level, driver level, and rider level.		
221:13 - 221:24	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:28	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.100</b>
	221:13 Third (edited)		
	221:14 row from the bottom is "Telematics." Do you see		
	221:15 that?		
	221:16 A. I do see that.		
	221:17 Q. And it says, "e.g., speed, hard brakes,		
	221:18 accelerations, phone handling, jerking." Do you see		
	221:19 where I'm reading from?		
	221:20 A. I'm able to see that.		
	221:21 Q. What are telematics?		
	221:22 A. That typically means the sensors on		
	221:23 someone's phone, like accelerometers and other		
	221:24 related sensors.		

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
222:05 - 222:07	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 222:05 Q. So Uber found that some telematics data 222:06 was a potential predictor of risk for sexual 222:07 assault, right?	00:00:11	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.101</b>
222:14 - 222:19	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 222:14 THE WITNESS: I had a chance to go through 222:15 it. I'm not seeing any analysis related to 222:16 telematics and any correlation with driver, at least 222:17 not in this document, and so that would be news to 222:18 me. So -- but it's possible that he connected this 222:19 somewhere else, yeah.	00:00:14	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.102</b>
222:21 - 223:02	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 222:21 Q. Have you looked at -- has your team looked 222:22 at the correlation or potential correlation between 222:23 telematics and risk for sexual assault? 222:24 A. We have not. 222:25 Q. Is that something that's in the S-RAD 223:01 models, either Version 1 or Version 2? 223:02 A. Not that I'm aware of.	00:00:15	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.103</b>
223:03 - 223:10	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 223:03 Q. Has Uber -- has its data team looked at 223:04 other types of telematics, like drivers going off 223:05 route, pulling over on the side of the road during a 223:06 route, staying at the same location with the rider 223:07 for a prolonged period after late-night rides, to 223:08 see whether those types of telematics are associated 223:09 with an increased risk of sexual assault? 223:10 A. I'm not aware of that (edited)	00:00:22	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.104</b>
224:16 - 224:20	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 224:16 Q. if Uber wanted (edited) 224:17 to, it could study whether RideCheck triggers are 224:18 associated with an increased risk of sexual assault, 224:19 right? 224:20 A. Potentially. (edited)	00:00:08	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.105</b>
241:25 - 242:05	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:19	<b>WS625_v10p-As-</b>

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
241:25 - 242:05	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 241:25 Q. If Uber wanted to, it could use the (edited) 242:01 knowledge it has of risk factors to just say "No, 242:02 and we're not going to make certain pairings," 242:03 right? 242:04 A. Again, it's possible there's many 242:05 different plans for a given trip. (edited)	00:00:19	<b>PlayedinCourt1-2 1-26.106</b>
242:21 - 242:25	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 242:21 Q. but no matter what, Uber will (edited) 242:22 always make sure that for any rider who requests a 242:23 trip, that if there are drivers anywhere nearby, it 242:24 is pairing somebody with that rider, right? 242:25 A. Correct.	00:00:13	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.107</b>
249:02 - 249:04	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 249:02 Q. If Uber wanted to block the top 1% of (edited) 249:03 trips as scored by S-RAD, it could choose to block 249:04 them, right?	00:00:11	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.108</b>
249:06 - 249:07	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 249:06 THE WITNESS: In a theoretical world, they 249:07 could (edited)	00:00:03	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.109</b>
255:07 - 255:07	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 255:07 Q. Can you pull up 1243, please. (edited)	00:00:03	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.110</b>
255:08 - 255:08	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 255:08 Fourth bullet point. Just to remind you, this is	00:00:02	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.111</b>
255:09 - 255:18	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 255:09 the Mike Akamine S-RAD frequently asked questions 255:10 for the Monthly Tech Review document. 255:11 A. Yep. 255:12 Q. And at the fourth bullet point, he says -- 255:13 well, actually, second bullet point says, "What else 255:14 can we do on risky trips?" Fourth bullet point 255:15 says, "Should we consider blocking individuals at 255:16 some point? Perhaps rule out access to	00:00:42	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.112</b>

DESIGNATION	SOURCE	DURATION	ID
	255:17 nighttime/bar trips?" Do you see that?		
	255:18 A. I do see that.		
255:19 - 255:21	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:11	<b>WS625_v10p-As-PlayedinCourt1-21-26.113</b>
	255:19 Q. Did anybody ever bring that question to		
	255:20 the attention of your data team to see if you could		
	255:21 look into blocking individuals at some point?		
255:25 - 256:11	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:31	<b>WS625_v10p-As-PlayedinCourt1-21-26.114</b>
	255:25 THE WITNESS: To the first highlighted		
	256:01 bullet point, "What else can we do on risky trips,"		
	256:02 I mean, that's just a continuous process, right? We		
	256:03 talked about continuing to invest in S-RAD, both on		
	256:04 the model side and on the intervention side, right.		
	256:05 So that's just something that we just do.		
	256:06 On the second highlighted part, again,		
	256:07 this is Mike Akamine just posing a question without		
	256:08 a lot of data. And that's why he relies on us to		
	256:09 tell him about precision, for example, right. So		
	256:10 this is, you know, his question that he's put on		
	256:11 here.		
259:13 - 259:15	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:16	<b>WS625_v10p-As-PlayedinCourt1-21-26.115</b>
	259:13 Q. And then precision. Your counsel had said		
	259:14 Exhibit 1243 related to S-RAD having low precision.		
	259:15 I found some language in there about low precision,		
259:16 - 260:04	<b>Wong, Sunny 2025-06-25 - PIP MP4</b>	00:00:50	<b>WS625_v10p-As-PlayedinCourt1-21-26.116</b>
	259:16 but not any data to back it up. And my question for		
	259:17 you is, can you, as the person Uber's designated to		
	259:18 speak on its behalf about risk-sensitive		
	259:19 dispatching, risk factors known to Uber, can you		
	259:20 point to any data that supports that S-RAD has low		
	259:21 precision?		
	259:22 A. The only data I have is from Exhibit 1243.		
	259:23 Q. At what page?		
	259:24 A. Page 5.		
	259:25 Q. Okay. And what data are you referring to?		
	260:01 A. I am referring to on the right-hand side,		
	260:02 lower right-hand side, it says "1 in 12,642 times		

## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	260:03 the model correctly predicted or identified an 260:04 incident." (edited)		
261:06 - 261:09	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 261:06 Q. And for a woman who's one of (edited)  261:07 the 1 in 12,000 that is sexually assaulted or the 261:08 victim of serious sexual misconduct, that probably 261:09 feels like too high a rate, right?	00:00:18	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.117</b>
261:11 - 261:12	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 261:11 THE WITNESS: I can't comment on whether  261:12 or not that's high or low.	00:00:03	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.118</b>
262:02 - 262:02	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 262:02 Q. And is that an acceptable rate to Uber?	00:00:03	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.119</b>
262:04 - 262:05	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 262:04 THE WITNESS: I can't comment on whether  262:05 or not that's acceptable or not.	00:00:04	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.120</b>
262:07 - 262:11	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 262:07 Q. You said you can't comment on whether it's  262:08 acceptable or not? 262:09 A. We haven't discussed whether or not 262:10 that's -- I'm just -- I'm just reading off data that 262:11 is on this slide.	00:00:08	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.121</b>
262:12 - 262:16	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 262:12 Q. Right, but as the person who is speaking  262:13 on behalf of Uber about its interventions related to 262:14 risk factors for sexual assault in the pairing 262:15 decisions, is this a -- is that a rate, a ratio 262:16 that's acceptable to Uber?	00:00:24	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.122</b>
262:18 - 263:01	<b>Wong, Sunny 2025-06-25 - PIP MP4</b> 262:18 THE WITNESS: I don't think it's  262:19 established that this is acceptable or not. These 262:20 are -- and what we see, it's a very -- it's a very 262:21 low precision control that we have in S-RAD, and	00:00:21	<b>WS625_v10p-As- PlayedinCourt1-2 1-26.123</b>


## WS625\_v10p-As-PlayedinCourt1-21-26 - Wong, Sunny 062525- v10p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
262:22	again, because of the rarity of such events, but		
262:23	again, that doesn't stop us from continuing to try		
262:24	to improve S-RAD, whether it's model improvements or		
262:25	intervention improvements, right. The work doesn't		
263:01	stop.		

PLF Affirmative	00:22:42
DEF Counter	00:03:09
<b>TOTAL RUN TIME</b>	<b>00:25:52</b>

# Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

## Designation List Report

	
Wong, Sunny	2025-07-23
Wong, Sunny	2025-07-23
Wong, Sunny	2025-10-14
Wong, Sunny	2025-10-14

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PLF Affirmative	00:25:37
DEF Counter	00:03:25
<b>TOTAL RUN TIME</b>	<b>00:29:02</b>



## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
67:25 - 68:03	<b>Wong, Sunny 2025-07-23 - PIP MP4</b> 67:25 (Exhibit 1823, US Production Model 68:01 S. Wong - Highly Confidential 68:02 Feature Importance-Top 20 Features was 68:03 marked for identification.)	00:00:00	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.1</b>
110:24 - 111:04	<b>Wong, Sunny 2025-07-23 - PIP MP4</b> 110:24 So when it comes to pairing a 110:25 driver with a particular trip request, the 111:01 S. Wong - Highly Confidential 111:02 only way that Uber accounts for the risk of 111:03 sexual assault or sexual misconduct is 111:04 through the S-RAD program, right?	00:00:15	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.2</b>
111:07 - 111:18	<b>Wong, Sunny 2025-07-23 - PIP MP4</b> 111:07 A. For pairing specifically or based 111:08 for -- step back. 111:09 For a given trip request, as far as 111:10 pairings, S-RAD is, as far as I know, the 111:11 main tool to use to reduce the risk of 111:12 serious sexual assault/sexual misconduct 111:13 through the pairing process. 111:14 Q. Isn't it the only tool that Uber 111:15 uses to reduce the risk of sexual assault or 111:16 sexual misconduct through the pairing 111:17 process? 111:18 A. Specifically pairing process, yes.	00:00:34	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.3</b>
118:15 - 118:18	<b>Wong, Sunny 2025-07-23</b> 118:15 MS. PETERS: Okay. Let's pull up 118:16 Exhibit 546, that's the one we just 118:17 looked at, page 8. The Bates page 118:18 ends in Bates 467.	00:00:11	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.4</b>
192:13 - 192:14	<b>Wong, Sunny 2025-07-23 - PIP MP4</b> 192:13 Q. Yeah, let's go to that together I 192:14 think this will be Exhibit 1823, page 1.	00:00:05	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.5</b>
235:20 - 235:21	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:00:00	<b>WS723_v7p-As-Pl</b>

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	235:20 (Exhibit 1826, PowerPoint, was		ayedInCourt1-21-26.6
	235:21 marked for identification.)		
237:06 - 237:08	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:00:08	<b>WS723_v7p-As-Pl</b>
	237:06 Q. And the orange line is for the		<b>ayedInCourt1-21-26.7</b>
	237:07 United States, right?		
	237:08 A. It looks to be the case, yes.		
237:14 - 238:11	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:01:06	<b>WS723_v7p-As-Pl</b>
	237:14 The X axis the horizontal axis along the		<b>ayedInCourt1-21-26.8</b>
	237:15 bottom, that's the trigger rate, right?		
	237:16 A. Correct.		
	237:17 Q. That is -- we talked about this		
	237:18 before, but that's the percentage of trips		
	237:19 that Uber flags using S-RAD, right?		
	237:20 A. That's correct.		
	237:21 Q. And so at like the 2 percent line,		
	237:22 that would be if Uber flags the 2 percent of		
	237:23 trips that have the highest risk score for		
	237:24 serious sexual assault/sexual misconduct,		
	237:25 right?		
	238:01 S. Wong - Highly Confidential		
	238:02 A. Correct.		
	238:03 Q. And that the far end of this on the		
	238:04 far right-hand side on this page, and there's		
	238:05 some other versions of this actually, but on		
	238:06 this page it doesn't say 10 percent, but that		
	238:07 only would represent 10 percent, right?		
	238:08 A. If -- yeah, the scale goes out		
	238:09 further potentially that looks like		
	238:10 10 percent since each bucket's like		
	238:11 2 percent.		
239:10 - 240:04	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:00:58	<b>WS723_v7p-As-Pl</b>
	239:10 My question was: At the 10 percent		<b>ayedInCourt1-21-26.9</b>
	239:11 trigger rate, the serious sexual		
	239:12 assault/sexual misconduct recall percent is		
	239:13 over 50 percent, right?		
	239:14 A. At 10 percent for the US model,		

DESIGNATION	SOURCE	DURATION	ID
	239:15 it's either at or near -- around or a little		
	239:16 bit higher than 50 percent, I can't say for		
	239:17 sure.		
	239:18 Q. Well, if we look at the 40 percent		
	239:19 bar and we look at the 60 percent bar and we		
	239:20 look at what's halfway between them, that		
	239:21 orange line, the tip of it at the far		
	239:22 right-hand side is more than halfway up,		
	239:23 right?		
	239:24 A. Based on the way you drew the line,		
	239:25 it's above the line there, yep.		
	240:01 S. Wong - Highly Confidential		
	240:02 Q. And that line is -- looks like it's		
	240:03 in the middle of 40 percent and 60 percent,		
	240:04 right?		
240:07 - 240:16	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:00:23	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.10</b>
	240:07 A. Yeah.		
	240:08 Q. And 50 percent is the number that's		
	240:09 in the middle of 40 percent and 60 percent,		
	240:10 right?		
	240:11 A. Right.		
	240:12 Q. So it looks like at 10 percent trip		
	240:13 trigger rate, the serious sexual		
	240:14 assault/sexual misconduct recall percent is		
	240:15 above 50 percent, right?		
	240:16 A. The recall rate, yes.		
241:07 - 241:11	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:00:21	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.11</b>
	241:07 Q. But what this tells us is that the		
	241:08 10 percent of trips that have the highest		
	241:09 S-RAD scores, more than 50 percent of all		
	241:10 serious sexual assault and sexual misconduct		
	241:11 incidents occur?		
241:14 - 241:20	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:00:17	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.12</b>
	241:14 A. Again, this is just a trigger rate		
	241:15 recall analysis, sorry, that someone		
	241:16 conducted. So yes, it -- on this chart,		
	241:17 it -- 10 percent re- -- 10 percent trigger		

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	241:18 refers to, you know, maybe a little over		
	241:19 50 percent recall, but again, that's just one		
	241:20 part of it in order to make safety impact.		
241:21 - 242:14	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:00:53	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.13</b>
	241:21 Q. Right. But translating that into		
	241:22 non-technical words that like a jury could		
	241:23 understand, this means that in the 10 percent		
	241:24 of trips that have the highest S-RAD score,		
	241:25 those -- that 10 percent of trips includes		
	242:01 S. Wong - Highly Confidential		
	242:02 the trips that would result in over		
	242:03 50 percent of the serious sexual		
	242:04 assault/sexual misconduct incidents, right?		
	242:05 A. The top 10 percent of the trips		
	242:06 based on the trigger rate represent the -- it		
	242:07 was able to identify 50 percent of the		
	242:08 incidents in this particular analysis from		
	242:09 2022 to 2023.		
	242:10 Q. And when you say "of the		
	242:11 incidents," you're talking about the		
	242:12 incidents of serious sexual assaults/sexual		
	242:13 misconduct, right?		
	242:14 A. That's correct.		
250:25 - 251:07	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:00:16	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.15</b>
	250:25 -- if (edited)		
	251:01 S. Wong - Highly Confidential		
	251:02 Uber had hypothetically blocked all the		
	251:03 10 percent riskiest trips, I know it's not		
	251:04 what it does, but if it did, then for this		
	251:05 dataset that would mean it was preventing		
	251:06 over 50 percent of the serious sexual		
	251:07 assault/sexual misconduct incidents, right?		
251:10 - 252:03	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:00:48	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.16</b>
	251:10 A. Again, it's more complex than that.		
	251:11 I can't speculate if it would, in fact,		
	251:12 prevent 50 percent of those incidents in this		
	251:13 particular sample, I just can't speculate on		

DESIGNATION	SOURCE	DURATION	ID
	251:14 it. Again, S-RAD does not block trips, we		
	251:15 established that already. So this would be		
	251:16 something totally different you want me to		
	251:17 opine on and I just don't have enough		
	251:18 information about that.		
	251:19 Q. Okay. Well, if Uber blocks a trip,		
	251:20 then the trip doesn't -- that particular		
	251:21 pairing doesn't happen, right?		
	251:22 A. Yeah, it doesn't happen. But		
	251:23 again, that's not what S-RAD does, it scores		
	251:24 individual supply plans, we talked about		
	251:25 that, does not block trips directly. And so		
	252:01 S. Wong - Highly Confidential		
	252:02 again, what we're discussing is something		
	252:03 totally different from S-RAD.		
252:04 - 252:19	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:00:35	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.17</b>
	252:04 Q. Right. But if Uber used its		
	252:05 identification part of S-RAD, the score, and		
	252:06 did block the trip pairings that were the		
	252:07 highest risk, then those trip pairings		
	252:08 obviously wouldn't happen, right, they		
	252:09 wouldn't take place if they were blocked?		
	252:10 A. I mean, S-RAD has an intervention		
	252:11 that downranks plans already and that's what		
	252:12 we have with soft filtering. With hard		
	252:13 filtering, plans that are above the threshold		
	252:14 we are, again, as you know we discussed last		
	252:15 time, we're hard filtering those, we're		
	252:16 actually taking those plans out of		
	252:17 consideration, right. So some versions of		
	252:18 that is kind of being done through S-RAD		
	252:19 already.		
252:22 - 253:07	<b>Wong, Sunny 2025-07-23 - PIP MP4</b>	00:00:19	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.18</b>
	252:22 Q. My question was simply, by		
	252:23 definition, if Uber blocked a particular		
	252:24 pairing, then that pairing wouldn't happen,		
	252:25 right?		
	253:01 S. Wong - Highly Confidential		

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	253:02 A. Yes.		
	253:03 Q. And if that was a pairing where the		
	253:04 driver went on to sexually assault that		
	253:05 rider, then than that assault wouldn't		
	253:06 happen, by definition, right?		
	253:07 A. Hypothetically, yes. (edited)		
271:17 - 271:23	<b>Wong, Sunny 2025-07-23</b>	00:00:18	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.19</b>
	271:17 There's no threshold score that		
	271:18 Uber sets as a constant across all places and		
	271:19 times, true?		
	271:20 A. True.		
	271:21 Q. And that's been true for 2022, 2023		
	271:22 and 2024, right?		
	271:23 A. Yes.		
357:05 - 357:10	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:20	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.20</b>
	357:05 Q. I want to talk first about the case		
	357:06 of Jaylynn Dean versus Uber.		
	357:07 Do you understand that this case is		
	357:08 about an allegation that during an Uber ride		
	357:09 on November 15, 2023, Uber driver		
	357:10 Hassan Turay raped Uber rider Jaylynn Dean?		
357:13 - 357:18	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:15	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.21</b>
	357:13 A. I'm aware that's one of the cases,		
	357:14 yes.		
	357:15 Q. And you understand that you're		
	357:16 speaking for Uber today about, among other		
	357:17 things, how Uber selected Mr. Turay to drive		
	357:18 Ms. Dean on that day, right?		
357:21 - 357:21	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:02	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.22</b>
	357:21 A. Yes.		
359:11 - 359:15	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:00	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.23</b>
	359:11 (Exhibit 2067, Cover sheet, Bates		
	359:12 UBER-MDL3084-BW-00048903, was marked		
	359:13 for identification.)		
	359:14 (Exhibit 2067A, Spreadsheet, was		

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	359:15 marked for identification.)		
359:23 - 360:04	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:17	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.24</b>
	359:23 Q. Do you have in front of you now		
	359:24 Mr. Wong the S-RAD score for that trip where		
	359:25 Ms. Dean was paired with Mr. Turay?		
	360:01 S. Wong - Highly Confidential		
	360:02 A. Yes, I do.		
	360:03 Q. Is that score .81?		
	360:04 A. Correct.		
360:10 - 360:17	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:23	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.25</b>
	360:10 Q. So before Uber paired Ms. Dean with		
	360:11 Mr. Turay on that date, its S-RAD program		
	360:12 calculated a risk score of .81 for that		
	360:13 pairing, right?		
	360:14 A. That's correct.		
	360:15 Q. And that is specifically a score		
	360:16 for the risk of sexual assault or sexual		
	360:17 misconduct, right?		
360:20 - 360:21	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:04	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.26</b>
	360:20 A. That's the score that is generated		
	360:21 from the S-RAD model.		
361:12 - 361:15	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:09	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.27</b>
	361:12 Q. It's an assessment or a score of		
	361:13 the risk of sexual assault or sexual		
	361:14 misconduct, right?		
	361:15 A. Correct.		
365:21 - 366:04	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:22	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.28</b>
	365:21 Q. The S-RAD score is a score that's		
	365:22 calculated by Uber's -- by a machine-learning		
	365:23 program that Uber uses, right?		
	365:24 A. Correct.		
	365:25 Q. That's a program that Uber's data		
	366:01 S. Wong - Highly Confidential		
	366:02 science team has been testing and validating		
	366:03 for years, right?		

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	366:04 A. Correct.		
368:18 - 368:25	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 368:18 Q. A score of zero reflects a lower 368:19 risk for sexual assault or sexual misconduct 368:20 for a given pairing and a score of 1 reflects 368:21 a higher risk for a score of -- for the risk 368:22 of sexual assault or sexual misconduct for a 368:23 pairing, right? 368:24 A. Higher score, yes. That's correct, 368:25 yeah.	00:00:22	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.29</b>
380:16 - 380:21	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 380:16 The score for Jaylynn's trip in 380:17 November 2015 was higher than the risk score 380:18 on average for Phoenix at nighttime that 380:19 month, right? 380:20 A. Correct, it was higher than the 380:21 average, correct.	00:00:17	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.30</b>
388:21 - 389:07	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 388:21 is it true that the 10 percent highest (edited) 388:22 scoring trips in this dataset with respect to 388:23 S-RAD scores included over 50 percent of 388:24 serious sexual misconduct and sexual assault 388:25 incidents? 389:01 S. Wong - Highly Confidential 389:02 A. From this theoretical analysis at 389:03 10 percent trigger rate for this sample 389:04 dataset, it would've flagged 50 -- roughly 389:05 50 percent of the sample of reported 389:06 sexual -- serious sexual assault/sexual 389:07 misconducts.	00:00:31	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.32</b>
391:04 - 391:10	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 391:04 Q. If Uber had flagged the 10 percent 391:05 of trips that had the highest S-RAD scores in 391:06 this dataset, it found that that would've 391:07 captured around 50 percent of trips where 391:08 serious sexual misconduct and sexual assault	00:00:21	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.33</b>

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	391:09 were reported, right?		
	391:10 A. Correct, for this dataset.		
392:18 - 392:21	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:10	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.36</b>
	392:18 Q. when Uber paired (edited)		
	392:19 Jaylynn with Mr. Turay, it had already		
	392:20 completed this analysis, true?		
	392:21 A. Yes, that part is true. (edited)		
396:12 - 396:17	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:20	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.37</b>
	396:12 Q. Mr. Wong, can you tell the jury one		
	396:13 way or the other whether the pairing of		
	396:14 Jaylynn with Mr. Turay in terms of its S-RAD		
	396:15 risk score fell into the top 1 percent for		
	396:16 risk of sexual assault/sexual misconduct		
	396:17 nationwide?		
396:20 - 396:20	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:02	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.38</b>
	396:20 A. I do not know that (edited)		
398:06 - 398:12	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:17	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.39</b>
	398:06 Q. Okay. If Uber had set a 10 percent		
	398:07 trigger rate in the aggregate instead of a		
	398:08 1.25 percent target trigger rate in the		
	398:09 aggregate and blocked all the pairings that		
	398:10 were in that top 10 percent, would the		
	398:11 pairing of Jaylynn with Mr. Turay have been		
	398:12 blocked?		
398:15 - 398:18	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:09	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.40</b>
	398:15 A. I have no way to know that. Again,		
	398:16 all I know is that that particular trip did		
	398:17 not get flagged as part of the threshold we		
	398:18 set at that time period.		
401:02 - 401:19	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:49	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.41</b>
	401:02 We know that Uber can set the		
	401:03 threshold lower if it wants to because Uber		
	401:04 did set the threshold lower in the		

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	401:05 San Francisco Bay Area during the daytime in		
	401:06 August of 2023, it set it at .77, right?		
	401:07 A. Correct. But as I mentioned, each		
	401:08 threshold is configured for that particular		
	401:09 city, right. So that's real, real important		
	401:10 each city is gonna look a little different,		
	401:11 each has external factors and risks, right.		
	401:12 And so that's why it's important to calculate		
	401:13 for a particular city and time of day as		
	401:14 well.		
	401:15 Q. And one thing that caused Uber to		
	401:16 set its risk tolerance differently for		
	401:17 Phoenix is that Phoenix is the most dangerous		
	401:18 city in the United States for the risk of		
	401:19 sexual assault on Uber Rides, right?		
401:25 - 402:03	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:07	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.42</b>
	401:25 A. I don't have data in front of me		
	402:01 S. Wong - Highly Confidential		
	402:02 to, you know, confirm or deny if that's a		
	402:03 true statement, so...		
402:16 - 402:17	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:06	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.43</b>
	402:16 MS. PETERS: Let's go to Tab 78,		
	402:17 Exhibit 2202 (edited)		
403:17 - 404:03	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:28	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.44</b>
	403:17 Item 2, Cities. This Uber (edited)		
	403:18 document says:		
	403:19 We looked at L12 week's IPC data to		
	403:20 identify cities with highest incidences of		
	403:21 sexual assaults.		
	403:22 And then sub-point A says:		
	403:23 Phoenix, Houston, Atlanta, Dallas,		
	403:24 and Denver has the highest rate of sexual		
	403:25 assault incidents.		
	404:01 S. Wong - Highly Confidential		
	404:02 Do you see that?		
	404:03 A. I see that.		
404:04 - 404:11	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:22	<b>WS723_v7p-As-Pl</b>

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	404:04 Q. And if we go to the next portion of		ayedincourt1-21-26.45
	404:05 that same page, those cities, the ones with		
	404:06 the highest incidents of sexual assault, are		
	404:07 listed and Phoenix is at the very top with a		
	404:08 sexual assault incident per one million trips		
	404:09 of 19.83.		
	404:10 Do you see that?		
	404:11 A. I'm able to see that.		
405:13 - 405:17	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:13	<b>WS723_v7p-As-Pl ayedincourt1-21-26.46</b>
	405:13 Q. Did anybody at Uber look at (edited)		
	405:14 what was the probability that a sexual		
	405:15 assault would occur if Uber made a pairing		
	405:16 with a sexual assault risk score of .81 in		
	405:17 Phoenix at nighttime?		
405:25 - 406:02	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:03	<b>WS723_v7p-As-Pl ayedincourt1-21-26.47</b>
	405:25 A. I'm not aware of anyone calculating		
	406:01 S. Wong - Highly Confidential		
	406:02 that.		
412:23 - 413:08	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:27	<b>WS723_v7p-As-Pl ayedincourt1-21-26.48</b>
	412:23 Q. But with respect to the risk of		
	412:24 sexual assault and sexual misconduct, once it		
	412:25 determines that the pairing with Mr. Turay is		
	413:01 S. Wong - Highly Confidential		
	413:02 below the threshold, Uber didn't take any		
	413:03 action to try to downrank or avoid that		
	413:04 pairing, right?		
	413:05 A. Not specifically S-RAD.		
	413:06 Q. Is that correct?		
	413:07 A. Not specifically S-RAD, that's		
	413:08 correct.		
413:09 - 413:14	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:16	<b>WS723_v7p-As-Pl ayedincourt1-21-26.49</b>
	413:09 Q. Was there any other program Uber		
	413:10 used other than S-RAD to try to downrank or		
	413:11 avoid pairing Jaylynn with Mr. Turay because		
	413:12 of the risk of sexual assault or sexual		

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	413:13 misconduct?		
	413:14 A. Not that I know of.		
415:04 - 415:07	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:08	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.50</b>
	415:04 Q. But first of all, you, on behalf of		
	415:05 Uber, don't know what the scores were of		
	415:06 other available trips that night, right?		
	415:07 A. That's correct.		
415:24 - 416:03	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:13	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.51</b>
	415:24 For that week for (edited)		
	415:25 nighttime trips in Phoenix, the S-RAD score		
	416:01 S. Wong - Highly Confidential		
	416:02 for Jaylynn's pairing with Mr. Turay was		
	416:03 above average, true?		
416:06 - 416:07	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:02	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.52</b>
	416:06 A. Compared to the last seven days,		
	416:07 correct.		
426:13 - 426:17	<b>Wong, Sunny 2025-10-14 - WIT MP4</b>	00:00:12	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.53</b>
	426:13 Q. What did Uber do after it		
	426:14 determined that Jaylynn's trip was below the		
	426:15 threshold? What is it it did further to try		
	426:16 to make sure it was picking the safest match		
	426:17 possible for her?		
426:20 - 426:23	<b>Wong, Sunny 2025-10-14 - WIT MP4</b>	00:00:08	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.54</b>
	426:20 A. Again, I don't know what other		
	426:21 plans were available at that time period,		
	426:22 right, to say whether or not that was -- if		
	426:23 there were other scores that were lower.		
426:24 - 427:10	<b>Wong, Sunny 2025-10-14 - WIT MP4</b>	00:00:22	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.55</b>
	426:24 Q. Right. But you don't need to know		
	426:25 whether there are others available 'cause you		
	427:01 S. Wong - Highly Confidential		
	427:02 know the way S-RAD works as we've covered		
	427:03 before is if the trip is below the threshold,		

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	427:04 S-RAD's done with -- it doesn't -- it doesn't		
	427:05 try to find the safest match possible as		
	427:06 between trips that are below the threshold,		
	427:07 right?		
	427:08 A. Correct. And at that point then		
	427:09 the rest of the supply plans move forward,		
	427:10 right.		
427:22 - 428:05	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:19	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.56</b>
	427:22 Q. No, I mean Uber does select		
	427:23 individual drivers, but the rider, Jaylynn,		
	427:24 did not, right?		
	427:25 A. That's correct.		
	428:01 S. Wong - Highly Confidential		
	428:02 Q. And did Uber tell Jaylynn that the		
	428:03 risk of sexual assault for that trip was		
	428:04 above average even for the Phoenix nighttime		
	428:05 area?		
428:08 - 428:15	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:18	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.57</b>
	428:08 A. No, we did not, and -- but nor is		
	428:09 it practical to provide such scores to		
	428:10 riders.		
	428:11 Q. Did it tell her that she was riding		
	428:12 in the most dangerous city for sexual assault		
	428:13 at the most dangerous time of the day on a		
	428:14 trip that was above average even for that		
	428:15 city and time of night?		
428:18 - 428:19	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:05	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.58</b>
	428:18 A. I'm not aware I was providing such		
	428:19 information to the rider.		
429:15 - 430:08	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:01:00	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.59</b>
	429:15 Q. All right. So we're looking at		
	429:16 Exhibit 2067A. And just to confirm, again,		
	429:17 this is a sheet that reflects the S-RAD score		
	429:18 for Jaylynn's pairing with Mr. Turay and the		
	429:19 features or inputs that went into that score,		
	429:20 right?		

**WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26**

DESIGNATION	SOURCE	DURATION	ID
	429:21 A. That's correct.		
	429:22 Q. One of the factors that went into		
	429:23 the risk score of .81 for this pairing was		
	429:24 the one-star ratings received by the driver,		
	429:25 Mr. Turay, right? That's at Line 14.		
	430:01 S. Wong - Highly Confidential		
	430:02 A. Driver one-star rate total,		
	430:03 correct.		
	430:04 Q. And Mr. Turay's one-star rate,		
	430:05 meaning how many one-star ratings he received		
	430:06 as a fraction of all ratings he received, was		
	430:07 1.07 percent, right?		
	430:08 A. Correct.		
431:24 - 432:05	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:18	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.60</b>
	431:24 Mr. Turay's one-star rate of		
	431:25 1.07 percent was more than double the median		
	432:01 S. Wong - Highly Confidential		
	432:02 one-star rate for drivers in the Phoenix area		
	432:03 of .45 percent, right?		
	432:04 A. It was higher than the median at		
	432:05 that time period. (edited)		
432:15 - 432:23	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:24	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.61</b>
	432:15 The median driver one-star rate for		
	432:16 the seven-day period leading up to this		
	432:17 incident in Phoenix was .45 percent, right?		
	432:18 A. That's correct.		
	432:19 Q. And that would mean that half of		
	432:20 all drivers had a one-star rate below that		
	432:21 level, 45 percent, and half had a rate above		
	432:22 that level, right?		
	432:23 A. Yep, that's what the median means.		
432:24 - 433:04	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:18	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.62</b>
	432:24 Q. Another factor that went into		
	432:25 Mr. Turay's -- into the S-RAD score for the		
	433:01 S. Wong - Highly Confidential		
	433:02 matching of Jaylynn with Mr. Turay was the		
	433:03 driver's Bliss rate, right? And that's line		

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	433:04 20.		
433:05 - 433:08	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:13	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.63</b>
	433:05 A. Yeah, that's one of the features.		
	433:06 Q. The Bliss rate for Mr. Turay was		
	433:07 .09 percent, right?		
	433:08 A. Correct.		
434:08 - 434:10	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:08	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.64</b>
	434:08 Q. that rate is about (edited)		
	434:09 1 in 1000 trips that somebody is making a		
	434:10 report to Uber about him, right?		
434:13 - 434:13	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:01	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.65</b>
	434:13 A. Right. (edited)		
437:12 - 437:17	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:21	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.66</b>
	437:12 Q. Okay. And so does -- in the way		
	437:13 that Uber uses this language, Driver Bliss		
	437:14 L1, 2, 3 rate, L1, 2, 3, 4 rate, this means		
	437:15 that for almost one in every thousand trips		
	437:16 Uber is receiving some report of some kind		
	437:17 about Mr. Turay, right?		
437:20 - 438:09	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:29	<b>WS723_v7p-As-Pl ayedInCourt1-21- 26.67</b>
	437:20 A. Right. Some type of report.		
	437:21 Again, very broad categories are including		
	437:22 here.		
	437:23 Q. And that would include dangerous		
	437:24 driving reports, right, that's one type of		
	437:25 Bliss report?		
	438:01 S. Wong - Highly Confidential		
	438:02 A. Potentially, correct, might include		
	438:03 road safety related reports.		
	438:04 Q. Might include within it ICP, or		
	438:05 interpersonal conflict reports, right?		
	438:06 A. Potentially, yes.		
	438:07 Q. It would include within it auto		
	438:08 collisions potentially, right?		
	438:09 A. Potentially, yep.		

**WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26**

DESIGNATION	SOURCE	DURATION	ID
440:06 - 440:14	<p><b>Wong, Sunny 2025-10-14 - PIP MP4</b></p> <p>440:06 Q. Okay. So let's go to Tab 8,</p> <p>440:07 page 1. Is this the feature importance for</p> <p>440:08 the US regional model?</p> <p>440:09 A. Correct, yes. That's what I'm</p> <p>440:10 looking at.</p> <p>440:11 Q. And on this -- and you believe this</p> <p>440:12 is the model that was in place for Jaylynn's</p> <p>440:13 trip?</p> <p>440:14 A. That's correct.</p>	00:00:25	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.68</b>
440:23 - 441:05	<p><b>Wong, Sunny 2025-10-14 - PIP MP4</b></p> <p>440:23 Do you see that the driver Bliss (edited)</p> <p>440:24 rate is Number 3 on the US regional model in</p> <p>440:25 terms of features that were most weighty?</p> <p>441:01 S. Wong - Highly Confidential</p> <p>441:02 A. Based on the feature analysis that</p> <p>441:03 was done at this time period, it was, you</p> <p>441:04 know, again one -- Number 3 on the list right</p> <p>441:05 behind the client version of that.</p>	00:00:21	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.69</b>
441:06 - 441:07	<p><b>Wong, Sunny 2025-10-14 - PIP MP4</b></p> <p>441:06 Q. Is that a "yes"?</p> <p>441:07 A. Yes.</p>	00:00:02	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.70</b>
443:14 - 443:22	<p><b>Wong, Sunny 2025-10-14 - PIP MP4</b></p> <p>443:14 Q. So Uber found that through its</p> <p>443:15 experimentation, the validation and the</p> <p>443:16 machine learning model that the driver Bliss</p> <p>443:17 rate, including things like everything from</p> <p>443:18 IPC to road safety issues were all</p> <p>443:19 potentially relevant to the risk of sexual</p> <p>443:20 assault and sexual misconduct when it makes a</p> <p>443:21 pairing, right?</p> <p>443:22 A. Yes. (edited)</p>	00:00:25	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.71</b>
446:17 - 446:17	<p><b>Wong, Sunny 2025-10-14 - PIP MP4</b></p> <p>446:17 Q. Going back to Exhibit 2067A, the</p>	00:00:05	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.72</b>

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
446:18 - 446:19	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 446:18 rate -- the Bliss rate for Mr. Turay, .09, 446:19 how high was that above median?	00:00:08	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.73</b>
446:22 - 446:24	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 446:22 A. I don't think we calculated that 446:23 here, so I can't say how that compares to the 446:24 median.	00:00:07	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.74</b>
456:02 - 456:07	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 456:02 Another feature that went into the 456:03 S-RAD score for Jaylynn and Mr. Turay was the 456:04 rate of late night requests at Line 33, that 456:05 means late night requests for the driver. 456:06 Do you see that? 456:07 A. I do.	00:00:17	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.75</b>
456:08 - 456:14	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 456:08 Q. And that was a feature that went 456:09 into the S-RAD score, right? 456:10 A. That's correct. 456:11 Q. That was something that Uber had 456:12 found was relevant to calculating the risk of 456:13 sexual assault and sexual misconduct, right? 456:14 A. Correct.	00:00:15	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.76</b>
456:15 - 456:17	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 456:15 Q. And Mr. Turay's late night request 456:16 rate was 28 percent, right? 456:17 A. That's correct.	00:00:06	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.77</b>
456:18 - 456:20	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 456:18 Q. Is that the rate of how -- how many 456:19 of his trips are late night requests? 456:20 A. Correct, that's my understanding.	00:00:09	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.78</b>
456:21 - 457:04	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 456:21 Q. Another feature that went into the	00:00:20	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.79</b>

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	456:22 risk score of .81 for Jaylynn's trip with 456:23 Mr. Turay was the weekend rate, the driver 456:24 weekend request rate, right? 456:25 A. Correct. 457:01 S. Wong - Highly Confidential 457:02 Q. And that was for Mr. Turay, 457:03 63.9 percent, right? 457:04 A. Correct.		
457:05 - 457:08	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 457:05 Q. That means that 63.9 percent of the  457:06 trips that he accepted were on the weekend, 457:07 right? 457:08 A. That's correct.	00:00:09	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.80</b>
468:06 - 468:10	<b>Wong, Sunny 2025-10-14 - WIT MP4</b> 468:06 Q. The number one feature (edited)  468:07 in terms of importance to the S-RAD score is 468:08 the hour of the day, right? 468:09 A. Yeah, the index trip hour logo, 468:10 yes.	00:00:12	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.81</b>
468:25 - 469:02	<b>Wong, Sunny 2025-10-14 - WIT MP4</b> 468:25 Q. Let's go back to Tab 8,  469:01 S. Wong - Highly Confidential 469:02 Exhibit 1823, the first page. The top line	00:00:07	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.83</b>
469:02 - 469:11	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 469:02 Exhibit 1823, the first page. The top line  469:03 shows that the trip hour is the Number 1 most 469:04 important feature in the S-RAD model, right? 469:05 A. Correct. 469:06 Q. And when you said that it's -- it 469:07 matters for how it comes up with the score, 469:08 we're talking about the score for the risk 469:09 of sexual assault and sexual misconduct, 469:10 right? 469:11 A. That's correct.	00:00:21	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.84</b>
469:12 - 469:17	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:18	<b>WS723_v7p-As-Pl ayedincourt1-21-</b>

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	469:12 Q. The trip hour for Jaylynn's trip		26.85
	469:13 with Mr. Turay was the middle of the night,		
	469:14 right?		
	469:15 A. Yeah, says local time on the		
	469:16 docket, looks like around midnight, it looks		
	469:17 like.		
470:02 - 470:06	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:12	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.86</b>
	470:02 Q. You can't say as the head of Uber's		
	470:03 data science team that addresses safety that		
	470:04 the middle of the night is a more dangerous		
	470:05 time of day with respect to sexual assault		
	470:06 and sexual misconduct?		
470:09 - 470:11	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:07	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.87</b>
	470:09 A. I mean, again, we know it's a		
	470:10 nighttime trip and we know that trip hour		
	470:11 were one of the most important features.		
471:02 - 471:05	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:20	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.88</b>
	471:02 Q. When Uber paired Jaylynn with		
	471:03 Mr. Turay in the middle of the night, did		
	471:04 Uber have any rule against pairing drivers		
	471:05 who had high Bliss rates with midnight rides?		
471:08 - 471:15	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:20	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.89</b>
	471:08 A. Again, we had S-RAD to help us with		
	471:09 scoring specific plans on a trip, so that was		
	471:10 the tool. As far as what you're talking		
	471:11 about, I'm not aware of something like that.		
	471:12 Q. We just talked about one of the		
	471:13 most important features for predicting sexual		
	471:14 assault and sexual misconduct is the time of		
	471:15 day, right?		
471:18 - 471:23	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:11	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.90</b>
	471:18 A. It's one of the most important		
	471:19 features, yeah, time of day, correct.		
	471:20 Q. And another one of the most		
	471:21 important features is the driver number of		

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DESIGNATION	SOURCE	DURATION	ID
	471:22 Bliss tickets, the driver Bliss rate, we 471:23 talked about that, right?		
472:02 - 472:03	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 472:02 A. That was the third feature below 472:03 the rider side for that feature, correct.	00:00:05	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.91</b>
472:04 - 472:08	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 472:04 Q. And did Uber ever, at the time it 472:05 paired Jaylynn with Mr. Turay, did it have 472:06 any rules in place to try to avoid pairing 472:07 midnight trips with drivers who had high 472:08 Bliss ticket rates?	00:00:17	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.92</b>
472:11 - 472:18	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 472:11 A. First of all, we don't know if the 472:12 driver in this case had a high or low -- I 472:13 don't have data to allow me to make that 472:14 assessment. So I don't know if we should 472:15 infer that he had a high rate. But I'm not 472:16 aware of -- it sounds like you're thinking 472:17 about other type of safety control or 472:18 product, so I'm not aware of that.	00:00:22	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.93</b>
474:18 - 474:23	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 474:18 On behalf of Uber, can you affirm 474:19 that the feedback tags were not part of the 474:20 S-RAD score of .81 for Jaylynn's transcripts 474:21 with Mr. Turay? 474:22 A. Let me double-check. 474:23 Q. Yep.	00:00:12	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.94</b>
474:24 - 475:03	<b>Wong, Sunny 2025-10-14 - PIP MP4</b> 474:24 A. (Document review.) 474:25 Yep, that's correct. Feedback tags 475:01 S. Wong - Highly Confidential 475:02 were not included as a feature, either on the 475:03 rider side or the driver side.	00:00:06	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.95</b>
479:09 - 479:13	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:14	<b>WS723_v7p-As-Pl</b>

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	479:09 Q. Gender was not part of the (edited)		ayedincourt1-21-26.96
	479:10 S-RAD score that the fact that Jaylynn was		
	479:11 opposite gender from Mr. Turay, right?		
	479:12 A. Just double-checking.		
	479:13 No, it was not one of the features.		
485:25 - 486:06	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:00	<b>WS723_v7p-As-Pl ayedincourt1-21-26.97</b>
	485:25 (Exhibit 2069, Demonstrative,		
	486:01 S. Wong - Highly Confidential		
	486:02 Bates UBER JCCP MDL 000908749.0044,		
	486:03 was marked for identification.)		
	486:04 (Exhibit 2070, Global Feature		
	486:05 Definitions, was marked for		
	486:06 identification.)		
514:02 - 514:07	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:21	<b>WS723_v7p-As-Pl ayedincourt1-21-26.98</b>
	514:02 Q. When did S-RAD first launch in		
	514:03 Phoenix?		
	514:04 A. Give me a second.		
	514:05 Initial launch of S-RAD to Phoenix		
	514:06 was part of the US regional model in		
	514:07 July 2022.		
536:19 - 537:03	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:22	<b>WS723_v7p-As-Pl ayedincourt1-21-26.100</b>
	536:19 I just want to make something very		
	536:20 clear, the number says .809. Is that a		
	536:21 percentage or a probability or anything like		
	536:22 that?		
	536:23 A. It's definitely not a probability.		
	536:24 It's a number, a score that the model		
	536:25 calculates and allows us to rank different		
	537:01 S. Wong - Highly Confidential		
	537:02 plans, right, for a given trip, but we		
	537:03 shouldn't think about it as a probability.		
537:14 - 537:23	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:18	<b>WS723_v7p-As-Pl ayedincourt1-21-26.101</b>
	537:14 Q. Do you recall getting some		
	537:15 questions earlier, Mr. Wong, where there was		
	537:16 like a picture of a thermometer on the		

DESIGNATION	SOURCE	DURATION	ID
	537:17 screen?		
	537:18 A. I do.		
	537:19 Q. And then there were different		
	537:20 numbers put on the screen next to the		
	537:21 thermometer. I want to ask you, did you feel		
	537:22 like that was an accurate representation of		
	537:23 what S-RAD scores mean?		
537:25 - 538:08	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:23	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.102</b>
	537:25 A. Absolutely not. And it's true that		
	538:01 S. Wong - Highly Confidential		
	538:02 the various S-RAD model ranges from zero to		
	538:03 one, but to frame it as like cold to hot, I		
	538:04 wouldn't frame it that way. We already		
	538:05 established that it is not a probability,		
	538:06 it's a score, it allows us to, you know, rank		
	538:07 things. But no, I would not -- definitely		
	538:08 would not frame it that way.		
538:11 - 538:25	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:36	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.103</b>
	538:11 counsel was asking you questions about (edited)		
	538:12 like a .8 threshold and a .77 threshold.		
	538:13 Are -- why aren't those comparable?		
	538:14 A. Right. Yeah, I mean it's -- a lot		
	538:15 of it is making comparisons between apples		
	538:16 and oranges, right. We calibrate a score for		
	538:17 a given city because each city looks		
	538:18 different and even from one time period to		
	538:19 another, right, what's 2023 versus 2024, and		
	538:20 then you have to take into account for within		
	538:21 a given city, whether it's nighttime for a		
	538:22 daytime. So that's why it wouldn't be		
	538:23 relevant to compare one city threshold versus		
	538:24 another 'cause just the environment could be		
	538:25 different.		
539:02 - 539:12	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:26	<b>WS723_v7p-As-Pl ayedincourt1-21- 26.104</b>
	539:02 Q. And, Mr. Wong, do you feel like		
	539:03 S-RAD program has helped reduce incidents of		
	539:04 sexual assault and sexual misconduct on the		

## WS723\_v7p-As-PlayedinCourt1-21-26 - Wong, Sunny 072325 - v7p - As-Played in Court 01-21-26

DESIGNATION	SOURCE	DURATION	ID
	539:05 Uber platform?		
	539:06 A. I do. I mean, we've reviewed		
	539:07 documents, we've done analysis, that's why we		
	539:08 continue to invest in it. So I'm super proud		
	539:09 of it. But the work doesn't stop, right, we		
	539:10 continue to invest in it. We launched S-RAD		
	539:11 2.0 end of last year. And again, that's		
	539:12 something we continue to invest into.		
539:20 - 539:25	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:13	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.105</b>
	539:20 Q. You just said that there's no way		
	539:21 to interpret the S-RAD score as a probability		
	539:22 because sexual assault and sexual misconduct		
	539:23 are super rare events.		
	539:24 Do you remember that testimony?		
	539:25 A. I do.		
540:02 - 540:12	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:29	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.106</b>
	540:02 Q. Has anybody on your team attempted		
	540:03 to calculate the probability of sexual		
	540:04 assault and sexual misconduct using the S-RAD		
	540:05 program?		
	540:06 A. Not that I know of.		
	540:07 Q. Has anybody on your team attempted		
	540:08 to calculate the rate of sexual assault and		
	540:09 sexual misconduct that occurs on trips that		
	540:10 are within a certain -- say the top		
	540:11 10 percent or top 1 percent of S-RAD scores?		
	540:12 A. Not that I know of.		
541:14 - 541:16	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:05	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.107</b>
	541:14 Q. And can you tell us the		
	541:15 distribution of S-RAD scores within that		
	541:16 dataset?		
541:19 - 541:19	<b>Wong, Sunny 2025-10-14 - PIP MP4</b>	00:00:01	<b>WS723_v7p-As-Pl ayedinCourt1-21- 26.108</b>
	541:19 A. I cannot.		

PLF Affirmative

00:25:37

DEF Counter	00:03:25
<b>TOTAL RUN TIME</b>	<b>00:29:02</b>