

COURT EXHIBIT 12A

Designation Run Report for Sunny Wong
as played in Court 1/23/2026 (January 7, 2026)

Wong, Sunny 010726 v7p-As-Played in Court 01-23-26

Designation List Report

	Wong, Sunny	2026-01-07
	Wong, Sunny	2026-01-07

PLF Affirmative	00:29:56
DEF Affirmative	00:09:20
DEF Counter	00:02:02
TOTAL RUN TIME	00:41:18



WS17_v7p-As-PlayedinCourt1-23-26 - Wong, Sunny 010726 v7p-As-Played in Court 01-23-26

DESIGNATION	SOURCE	DURATION	ID
8:03 - 8:04	Wong, Sunny 2026-01-07 8:03 Q. Good morning, Mr. Wong. 8:04 A. Good morning.	00:00:02	WS17_v7p-As-Pla yedinCourt1-23-2 6.1
10:15 - 10:18	Wong, Sunny 2026-01-07 10:15 Q. What was your 2025 bonus? 10:16 A. I don't recall off the top of my head what 10:17 my bonus was. 10:18 Q. You don't recall your bonus for 2025?	00:00:09	WS17_v7p-As-Pla yedinCourt1-23-2 6.2
10:20 - 10:22	Wong, Sunny 2026-01-07 10:20 THE WITNESS: Yeah, I don't recall. I 10:21 don't keep that in my mind. I don't think about my 10:22 bonus regularly.	00:00:05	WS17_v7p-As-Pla yedinCourt1-23-2 6.3
14:15 - 14:20	Wong, Sunny 2026-01-07 14:15 Q. So let's focus on your current (edited) 14:16 holdings in Uber stock and stock options. What's 14:17 the value of that? 14:18 A. I haven't checked recently. I don't check 14:19 daily on how much those -- my -- the value of my 14:20 holdings are worth.	00:00:13	WS17_v7p-As-Pla yedinCourt1-23-2 6.4
15:13 - 15:14	Wong, Sunny 2026-01-07 15:13 Q. Was it potentially more than \$2 million, 15:14 Mr. Wong?	00:00:03	WS17_v7p-As-Pla yedinCourt1-23-2 6.5
15:17 - 15:18	Wong, Sunny 2026-01-07 15:17 THE WITNESS: Potentially. Again, I don't 15:18 remember specific numbers. I don't check regularly.	00:00:05	WS17_v7p-As-Pla yedinCourt1-23-2 6.6
18:13 - 18:15	Wong, Sunny 2026-01-07 18:13 Q. If people stopped using Uber because they 18:14 realized that it wasn't as safe as they thought, 18:15 that could affect the stock price, right?	00:00:06	WS17_v7p-As-Pla yedinCourt1-23-2 6.7
18:18 - 19:03	Wong, Sunny 2026-01-07 18:18 THE WITNESS: Again, there are numerous	00:00:22	WS17_v7p-As-Pla yedinCourt1-23-2 6.8

DESIGNATION	SOURCE	DURATION	ID
	18:19 factors that drive a stock price. I can't speculate		
	18:20 what -- you know, what individual factors will drive		
	18:21 it.		
	18:22 BY MS. WALSH:		
	18:23 Q. Okay. So you don't know one way or the		
	18:24 other if a significant decline in the usage of Uber		
	18:25 because people are worried about the safety of		
	19:01 taking Uber -- you don't know one way or the other		
	19:02 whether that would affect Uber's stock price? Is		
	19:03 that your testimony?		
19:06 - 19:20	Wong, Sunny 2026-01-07	00:00:39	WS17_v7p-As-Pla yedinCourt1-23-2 6.9
	19:06 THE WITNESS: Again, I don't want to		
	19:07 speculate on, you know, a hypothetical situation.		
	19:08 BY MS. WALSH:		
	19:09 Q. Okay. Okay. Well, let's talk about a		
	19:10 real situation. Okay?		
	19:11 A. Okay.		
	19:12 Q. You know that Jaylynn Dean reported that		
	19:13 she was raped by the driver that Uber sent to her on		
	19:14 the night of November 15th, 2023, correct?		
	19:15 A. I believe we're here talking about her --		
	19:16 her trip and the report that was made, correct.		
	19:17 Q. And that was a report of rape, correct,		
	19:18 Mr. Wong?		
	19:19 A. I'm aware -- I believe it's a report of a		
	19:20 serious sexual assault/sexual misconduct.		
20:04 - 20:10	Wong, Sunny 2026-01-07	00:00:15	WS17_v7p-As-Pla yedinCourt1-23-2 6.10
	20:04 Q. Did (edited)		
	20:05 your employer tell you before you came to testify		
	20:06 that, in fact, what Ms. Dean reported is that she		
	20:07 was raped by the driver that Uber sent to her on the		
	20:08 night of November 15th, 2023? Did you know that?		
	20:09 A. Yeah, I'm aware there was a report of a		
	20:10 sexual assault on that trip.		
21:02 - 21:20	Wong, Sunny 2026-01-07	00:01:00	WS17_v7p-As-Pla yedinCourt1-23-2 6.11
	21:02 Q. Okay. So you also know and you've		
	21:03 examined records concerning the fact that the S-RAD		

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DESIGNATION	SOURCE	DURATION	ID
	21:04 tool, Uber's S-RAD tool, assessed the risk of		
	21:05 Ms. Jaylynn Dean's ride that night, correct?		
	21:06 A. My understanding, S-RAD was active for		
	21:07 that particular trip, so mm-hmm.		
	21:08 Q. And it produced a score for that trip,		
	21:09 correct?		
	21:10 A. It was able to produce scores for the		
	21:11 different rider-driver supply plans for that trip.		
	21:12 And right, so it was able to score all the		
	21:13 individual pairings.		
	21:14 Q. Okay. And one of the individual pairings		
	21:15 that it scored was the pairing between Ms. Dean and		
	21:16 Hassan Turay, correct?		
	21:17 A. That's correct.		
	21:18 Q. And Hassan Turay is the driver that Uber		
	21:19 dispatched to pick up Mrs. Dean -- Ms. Dean that		
	21:20 night, correct?		
21:23 - 22:02	Wong, Sunny 2026-01-07	00:00:07	WS17_v7p-As-Pla yedinCourt1-23-2 6.12
	21:23 THE WITNESS: Correct.		
	21:24 BY MS. WALSH:		
	21:25 Q. And that particular pairing, S-RAD gave it		
	22:01 a score, correct?		
	22:02 A. Correct.		
22:05 - 22:11	Wong, Sunny 2026-01-07	00:00:20	WS17_v7p-As-Pla yedinCourt1-23-2 6.13
	22:05 The score that S-RAD gave to that pairing		
	22:06 was a .81, correct?		
	22:07 A. That's correct.		
	22:08 Q. And that was -- the range of S-RAD scores,		
	22:09 s-RAD can score a pairing from anything from zero up		
	22:10 to 1, right?		
	22:11 A. That's correct.		
25:05 - 25:19	Wong, Sunny 2026-01-07	00:00:33	WS17_v7p-As-Pla yedinCourt1-23-2 6.14
	25:05 Q. Okay. And does that mean that you -- do		
	25:06 you continue to head up the Data Science team that		
	25:07 works on personal safety at Uber?		
	25:08 A. That's correct.		
	25:09 Q. Okay. And the safety issues you work on		

DESIGNATION	SOURCE	DURATION	ID
	25:10 include sexual assaults, right?		
	25:11 A. Yeah, one of the areas that we work on		
	25:12 include serious sexual assault/sexual misconduct.		
	25:13 Q. Okay. And sexual assault is a serious		
	25:14 issue, correct?		
	25:15 A. I think that's a serious broader societal		
	25:16 issue, yeah.		
	25:17 Q. Well, you know this case is about Uber,		
	25:18 right, Mr. Wong?		
	25:19 A. I do.		
35:07 - 35:12	Wong, Sunny 2026-01-07	00:00:16	WS17_v7p-As-Pla yedinCourt1-23-2 6.15
	35:07 Q. Mr. Wong, other than S-RAD, are there any		
	35:08 other safety programs that Uber uses to try to		
	35:09 reduce the risk of sexual assault with respect to		
	35:10 its dispatch or driver-ride matches? Are you aware		
	35:11 of any?		
	35:12 A. I'm not aware of any other.		
38:18 - 39:07	Wong, Sunny 2026-01-07	00:00:36	WS17_v7p-As-Pla yedinCourt1-23-2 6.16
	38:18 Q. S-RAD was active at the time of (edited)		
	38:19 Ms. Dean's ride, correct?		
	38:20 A. Correct.		
	38:21 Q. And S-RAD scored Ms. Dean's pairing with		
	38:22 Mr. Turay, correct?		
	38:23 A. Correct.		
	38:24 Q. And the score that S-RAD gave, that		
	38:25 pairing was .81, correct?		
	39:01 A. Correct.		
	39:02 Q. And that's out of a range of possible		
	39:03 scores from zero to 1, correct?		
	39:04 A. Yes.		
	39:05 Q. Okay. And even though the score was way		
	39:06 up at .81, Uber sent Mr. Turay to pick up Ms. Dean		
	39:07 that night, correct?		
39:09 - 39:11	Wong, Sunny 2026-01-07	00:00:06	WS17_v7p-As-Pla yedinCourt1-23-2 6.17
	39:09 THE WITNESS: It was below the threshold,		
	39:10 so it was dispatched, right. That particular plan		
	39:11 was dispatched.		

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DESIGNATION	SOURCE	DURATION	ID
39:16 - 39:18	Wong, Sunny 2026-01-07 39:16 Even though the score was .81, Uber 39:17 dispatched Mr. Turay to pick up Ms. Dean that night, 39:18 correct?	00:00:09	WS17_v7p-As-Pla yedinCourt1-23-2 6.18
39:20 - 39:20	Wong, Sunny 2026-01-07 39:20 THE WITNESS: Yes, it was dispatched.	00:00:03	WS17_v7p-As-Pla yedinCourt1-23-2 6.19
54:02 - 54:07	Wong, Sunny 2026-01-07 54:02 Q. I think we all (edited) 54:03 want to make sure the jury understands how S-RAD 54:04 works. Okay? So let's -- let's break it down, and 54:05 I'm going to show you demonstrative -- a 54:06 demonstrative, which I know will be familiar to you 54:07 from your prior deposition. And this is AW36 (edited)	00:00:18	WS17_v7p-As-Pla yedinCourt1-23-2 6.20
54:17 - 55:03	Wong, Sunny 2026-01-07 54:17 Q. Okay. So this is familiar to you as 54:18 something that comes from within Uber's internal 54:19 files, correct? 54:20 A. Correct. 54:21 Q. Okay. And what it shows us, if you look 54:22 in the upper left corner, is "S-RAD/The Concept," 54:23 right? 54:24 A. Correct. 54:25 Q. Okay. And the concept is that it's 55:01 supposed to be optimizing dispatch with safety in 55:02 mind, right? 55:03 A. That's what it says on the slide.	00:00:27	WS17_v7p-As-Pla yedinCourt1-23-2 6.21
56:02 - 56:07	Wong, Sunny 2026-01-07 56:02 So we see a rider there depicted in the 56:03 middle. And you agree that that's what Uber was 56:04 attempting to depict in this figure when they made 56:05 it, correct? That this is -- that the rider is the 56:06 person in the middle -- 56:07 A. Correct.	00:00:14	WS17_v7p-As-Pla yedinCourt1-23-2 6.22
57:13 - 58:13	Wong, Sunny 2026-01-07	00:01:20	WS17_v7p-As-Pla yedinCourt1-23-2

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DESIGNATION	SOURCE	DURATION	ID
57:13	Q. And I've gotten familiar with your		6.23
57:14	parlance a little bit. What you all call these		
57:15	are -- these potential pairings are supply plans or		
57:16	trip plans, correct?		
57:17	A. Correct. That's another one we call		
57:18	internally.		
57:19	Q. And so what S-RAD does -- as part of what		
57:20	S-RAD does is it scores each of these potential		
57:21	pairings based on the risk of sexual assault or		
57:22	sexual misconduct for each potential pairing,		
57:23	correct?		
57:24	A. Correct. It takes into account the		
57:25	pairing and, in aggregate, the trip itself.		
58:01	Q. Okay. So is it true that S-RAD scores		
58:02	potential pairings based on the risk of sexual		
58:03	assault or sexual misconduct for each pairing?		
58:04	A. It's scoring each of the pairings and		
58:05	trying to understand how prevalent certain		
58:06	conditions are we've seen historically. And again,		
58:07	once it has the scores for each of the pairings,		
58:08	then it will assess what potentially it might want		
58:09	to intervene on or downrank.		
58:10	Q. Okay. Do you remember, when you were		
58:11	testifying on behalf of Uber, Mr. Wong, being asked		
58:12	the following question and giving the following		
58:13	answer? And we'll play Wong Clip 15, please.		
58:14 - 58:20	Wong, Sunny 2026-01-07	00:00:19	WS17_v7p-As-Pla yedinCourt1-23-2 6.24
58:14	(Whereupon a video clip was played as		
58:15	follows:		
58:16	"Q. True that S-RAD scores potential		
58:17	pairings based on the risk of sexual		
58:18	assault or sexual misconduct for each		
58:19	pairing?		
58:20	"Yes.		
61:06 - 61:10	Wong, Sunny 2026-01-07	00:00:13	WS17_v7p-As-Pla yedinCourt1-23-2 6.25
61:06	You would agree that on the scoring that		
61:07	S-RAD does, that 1 reflects a higher risk, and zero		
61:08	reflects a lower risk of sexual assault or sexual		

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DESIGNATION	SOURCE	DURATION	ID
	61:09 misconduct, correct?		
	61:10 A. Correct.		
61:22 - 62:01	Wong, Sunny 2026-01-07	00:00:13	WS17_v7p-As-Played inCourt1-23-2 6.26
	61:22 Q. Okay. So this is what we just discussed,		
	61:23 right, Mr. Wong? That for the range of S-RAD		
	61:24 scores, the range of scores that S-RAD can give, the		
	61:25 scores can range between zero and 1, correct?		
	62:01 A. Correct.		
66:02 - 66:05	Wong, Sunny 2026-01-07	00:00:09	WS17_v7p-As-Played inCourt1-23-2 6.27
	66:02 Q. So turning to Ms. Dean, the score for the		
	66:03 pairing of Ms. Dean with Mr. Turay, as we've		
	66:04 discussed, was .81, correct?		
	66:05 A. Correct.		
66:11 - 67:10	Wong, Sunny 2026-01-07	00:01:10	WS17_v7p-As-Played inCourt1-23-2 6.28
	66:11 Q. So between zero and 1, the pairing (edited)		
	66:12 of Ms. Dean and Mr. Turay, it was .81, correct,		
	66:13 Mr. Wong?		
	66:14 A. Correct.		
	66:15 Q. Okay. And have you seen a picture of		
	66:16 Ms. Dean before?		
	66:17 A. I don't recall that I have.		
	66:18 Q. Okay. Well, we see Ms. Dean on the left		
	66:19 represented here, and she's the plaintiff in this		
	66:20 case who reported being raped by her Uber driver,		
	66:21 correct?		
	66:22 A. Correct.		
	66:23 Q. And Mr. Turay, that is the driver that		
	66:24 Uber sent to pick her up on the night of		
	66:25 November 15th, 2023. Do you understand that?		
	67:01 A. Yes.		
	67:02 Q. And Uber was aware, when it sent Mr. Turay		
	67:03 to pick up Ms. Dean, that S-RAD had scored this ride		
	67:04 a .81. Do you understand that?		
	67:05 A. That was the score for that plan, correct.		
	67:06 Q. Okay. And that 81 was specifically the		
	67:07 score for the risk of sexual assault or sexual		
	67:08 misconduct for that pairing of Ms. Dean and		

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DESIGNATION	SOURCE	DURATION	ID
	67:09 Mr. Turay, correct?		
	67:10 A. Correct.		
67:11 - 67:13	Wong, Sunny 2026-01-07	00:00:09	WS17_v7p-As-Pla yedinCourt1-23-2 6.29
	67:11 Q. And notwithstanding that the score was		
	67:12 .81, Uber went ahead and sent Mr. Turay to pick up		
	67:13 Ms. Dean on that night, correct?		
67:15 - 67:19	Wong, Sunny 2026-01-07	00:00:12	WS17_v7p-As-Pla yedinCourt1-23-2 6.30
	67:15 THE WITNESS: Again, as I mentioned, that		
	67:16 score of .81 was below the threshold that was set		
	67:17 for that particular trip, and so that's why it did		
	67:18 not get -- we did not intervene on that particular		
	67:19 trip.		
67:21 - 67:22	Wong, Sunny 2026-01-07	00:00:04	WS17_v7p-As-Pla yedinCourt1-23-2 6.31
	67:21 Q. That's why you didn't do anything to		
	67:22 prevent that risky match, correct?		
67:24 - 68:04	Wong, Sunny 2026-01-07	00:00:16	WS17_v7p-As-Pla yedinCourt1-23-2 6.32
	67:24 THE WITNESS: I don't agree with that		
	67:25 assessment. Again, S-RAD was active at that time.		
	68:01 We scored the pairing along with other possible		
	68:02 pairings at that time, and we determined that it was		
	68:03 below the threshold for that particular trip, which		
	68:04 was why it got dispatched.		
68:06 - 69:03	Wong, Sunny 2026-01-07	00:00:58	WS17_v7p-As-Pla yedinCourt1-23-2 6.33
	68:06 Q. And that threshold is the threshold that		
	68:07 you choose at Uber, correct?		
	68:08 A. We don't manually choose that. There's a		
	68:09 threshold that has been established for this		
	68:10 particular trip.		
	68:11 Q. And that threshold is established based in		
	68:12 part on marketplace considerations, isn't it?		
	68:13 A. There -- so it's part of the overall		
	68:14 trigger rate that has been established. And again,		
	68:15 there are many factors that are going in play, and		
	68:16 there's alignment that we have to reach with		
	68:17 cross-functional partners.		

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DESIGNATION	SOURCE	DURATION	ID
	68:18 Q. And those cross-functional partners		
	68:19 include lawyers, correct?		
	68:20 A. Possibly, but there are many other teams		
	68:21 that we work with.		
	68:22 Q. Includes operations, correct?		
	68:23 A. Potentially, yes.		
	68:24 Q. Includes your businesspeople, correct?		
	68:25 A. I don't know the businesspeople you're		
	69:01 referring to, but includes many different teams.		
	69:02 Q. Includes people who are considering how		
	69:03 healthy Uber's marketplace is, correct?		
69:05 - 69:11	Wong, Sunny 2026-01-07	00:00:14	WS17_v7p-As-Pla
	69:05 THE WITNESS: There's many teams looking		yedinCourt1-23-2
			6.34
	69:06 at the marketplace of Uber. I don't know		
	69:07 specifically what team you're referring to.		
	69:08 BY MS. WALSH:		
	69:09 Q. So Safety doesn't decide what the		
	69:10 threshold is. It's lots of other people who come		
	69:11 together to decide what it should be, right?		
69:13 - 69:24	Wong, Sunny 2026-01-07	00:00:34	WS17_v7p-As-Pla
	69:13 THE WITNESS: As I mentioned, there are		yedinCourt1-23-2
			6.35
	69:14 many considerations when we, you know, decide on a		
	69:15 specific trigger rate or threshold, whatever, and		
	69:16 that includes safety teams, legal teams, operations		
	69:17 teams. So there are many teams involved.		
	69:18 BY MS. WALSH:		
	69:19 Q. Okay. And what all those teams decided on		
	69:20 this -- at this time in Phoenix was that the		
	69:21 threshold that they were going to set for nighttime		
	69:22 of Phoenix was .936, correct?		
	69:23 A. I believe that was the threshold relevant		
	69:24 for this trip at that time.		
70:03 - 70:10	Wong, Sunny 2026-01-07	00:00:25	WS17_v7p-As-Pla
	70:03 Q. So this accurately reflects what was going		yedinCourt1-23-2
			6.36
	70:04 on that night, right, Mr. Wong?		
	70:05 A. That is correct. The pairing had a score		
	70:06 of .81, and it was below the threshold of .936.		

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DESIGNATION	SOURCE	DURATION	ID
	70:07 Q. Okay. So Uber decided on that night that, 70:08 as long as the score wasn't at the very, very, very, 70:09 very tiptop above .936, then S-RAD wasn't going to 70:10 intervene to do anything, right?		
70:12 - 71:01	Wong, Sunny 2026-01-07	00:00:35	WS17_v7p-As-Pla yedinCourt1-23-2 6.37
	70:12 THE WITNESS: Again, S-RAD is set up 70:13 where, if the score is -- for that pairing is below 70:14 the threshold, then that potentially we will 70:15 consider that plan and we will not downrank that 70:16 particular plan. 70:17 BY MS. WALSH: 70:18 Q. Okay. And .936, which is pretty close to 70:19 1, that was the threshold in Phoenix that night, 70:20 right? 70:21 A. That was the threshold in Phoenix. 70:22 Q. Okay. And you're aware that Uber 70:23 understood and discussed internally that Phoenix was 70:24 one of the most dangerous cities for sexual assault 70:25 at various times since Uber's been operating there, 71:01 correct?		
71:03 - 71:06	Wong, Sunny 2026-01-07	00:00:09	WS17_v7p-As-Pla yedinCourt1-23-2 6.38
	71:03 THE WITNESS: There potentially might have 71:04 been analysis done for different cities with regards 71:05 to reports. I don't recall any specific numbers or 71:06 specific cities right now.		
71:08 - 71:21	Wong, Sunny 2026-01-07	00:00:36	WS17_v7p-As-Pla yedinCourt1-23-2 6.39
	71:08 Q. But you're not -- you've been shown (edited) 71:09 documents, Mr. Wong. Do you recall on your last 71:10 deposition showing that Phoenix had been ranked as 71:11 the most dangerous city for sexual assault in 2019? 71:12 Do you recall that? 71:13 A. I'd probably need to review a document, 71:14 but I wouldn't be surprised there were some 71:15 documents we reviewed about certain cities and maybe 71:16 their report rates. 71:17 Q. How does Phoenix rank today in terms of 71:18 the risk of sexual assault for people using the Uber		

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DESIGNATION	SOURCE	DURATION	ID
	71:19 platform?		
	71:20 A. I don't have that information in front of		
	71:21 me.		
71:25 - 72:04	Wong, Sunny 2026-01-07	00:00:20	WS17_v7p-As-Pla yedinCourt1-23-2 6.40
	71:25 Q. How did Phoenix rank on November 15th,		
	72:01 2023 in terms of its -- the risk of a rider or a		
	72:02 driver being sexually assaulted on the Uber		
	72:03 platform? What was its rank on the night of		
	72:04 Ms. Dean's trip?		
72:07 - 72:07	Wong, Sunny 2026-01-07	00:00:01	WS17_v7p-As-Pla yedinCourt1-23-2 6.41
	72:07 THE WITNESS: I do not know.		
72:09 - 72:11	Wong, Sunny 2026-01-07	00:00:13	WS17_v7p-As-Pla yedinCourt1-23-2 6.42
	72:09 Q. Did Uber tell Ms. Dean that S-RAD (edited)		
	72:10 had scored her pairing with Mr. Turay as high as at		
	72:11 .81 before it sent her that ride?		
72:13 - 72:18	Wong, Sunny 2026-01-07	00:00:15	WS17_v7p-As-Pla yedinCourt1-23-2 6.43
	72:13 THE WITNESS: I'm not aware.		
	72:14 BY MS. WALSH:		
	72:15 Q. Did Uber tell Ms. Dean that it set the		
	72:16 flagging threshold for Phoenix on that night all the		
	72:17 way up at .936 before it sent Mr. Turay to pick her		
	72:18 up?		
72:20 - 72:25	Wong, Sunny 2026-01-07	00:00:21	WS17_v7p-As-Pla yedinCourt1-23-2 6.44
	72:20 THE WITNESS: I'm not aware.		
	72:21 BY MS. WALSH:		
	72:22 Q. Did Uber tell Ms. Dean that there even was		
	72:23 such a thing as S-RAD that was scoring the risk of		
	72:24 sexual assault for the potential pairing she might		
	72:25 get that night in November 2023?		
73:02 - 73:05	Wong, Sunny 2026-01-07	00:00:07	WS17_v7p-As-Pla yedinCourt1-23-2 6.45
	73:02 THE WITNESS: I'm not aware.		
	73:03 BY MS. WALSH:		
	73:04 Q. In fact, Mr. Wong, you know that none of		

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DESIGNATION	SOURCE	DURATION	ID
	73:05 those things were shared with Ms. Dean, don't you?		
73:07 - 73:12	Wong, Sunny 2026-01-07	00:00:14	WS17_v7p-As-Pla yedinCourt1-23-2 6.46
	73:07 THE WITNESS: Again, I'm not aware that		
	73:08 any of that information was shared with her.		
	73:09 BY MS. WALSH:		
	73:10 Q. Uber doesn't tell anyone about what their		
	73:11 S-RAD scores are before they send the driver to go		
	73:12 pick them up, do they?		
73:14 - 73:14	Wong, Sunny 2026-01-07	00:00:02	WS17_v7p-As-Pla yedinCourt1-23-2 6.47
	73:14 THE WITNESS: No, they do not.		
74:07 - 74:13	Wong, Sunny 2026-01-07	00:00:27	WS17_v7p-As-Pla yedinCourt1-23-2 6.48
	74:07 Q. Mr. Wong, you know that the average risk		
	74:08 score for the week that Ms. Dean took this ride with		
	74:09 Mr. Turay, that the average S-RAD score was .68,		
	74:10 correct? Do you recall that?		
	74:11 A. I recall that, yes.		
	74:12 MS. WALSH: Okay. So if we could add that		
	74:13 to the demonstrative, please.		
75:24 - 76:03	Wong, Sunny 2026-01-07	00:00:25	WS17_v7p-As-Pla yedinCourt1-23-2 6.49
	75:24 To your knowledge, Mr. Wong, did Uber		
	75:25 share with Ms. Dean the fact that her pairing with		
	76:01 Mr. Turay was scored a .81, which was above the		
	76:02 average S-RAD score for Phoenix during that week in		
	76:03 November 2023?		
76:06 - 76:07	Wong, Sunny 2026-01-07	00:00:03	WS17_v7p-As-Pla yedinCourt1-23-2 6.50
	76:06 Q. Was that information shared with Ms. Dean,		
	76:07 or was it not?		
76:09 - 76:09	Wong, Sunny 2026-01-07	00:00:01	WS17_v7p-As-Pla yedinCourt1-23-2 6.51
	76:09 THE WITNESS: Not that I know of.		
77:06 - 77:14	Wong, Sunny 2026-01-07	00:00:23	WS17_v7p-As-Pla yedinCourt1-23-2 6.52
	77:06 Q. Just to reorient the jury, when (edited)		
	77:07 S-RAD scores driver-rider pairings, the highest		

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DESIGNATION	SOURCE	DURATION	ID
	77:08 score that can be given to a pairing is 1 by S-RAD,		
	77:09 correct?		
	77:10 A. Correct.		
	77:11 Q. And the lowest score that can be given is		
	77:12 zero, correct?		
	77:13 A. Correct.		
	77:14 Q. And Ms. Dean's score was a .81, correct?		
77:16 - 77:21	Wong, Sunny 2026-01-07	00:00:18	WS17_v7p-As-Pla yedinCourt1-23-2 6.53
	77:16 THE WITNESS: Correct.		
	77:17 BY MS. WALSH:		
	77:18 Q. And S-RAD did not intervene to do anything		
	77:19 to stop the pairing of Ms. Dean and Mr. Turay		
	77:20 because that .81 was below Uber's threshold for		
	77:21 flagging risky rides, correct?		
77:23 - 77:24	Wong, Sunny 2026-01-07	00:00:03	WS17_v7p-As-Pla yedinCourt1-23-2 6.54
	77:23 THE WITNESS: Yes, the score was below the		
	77:24 threshold.		
78:09 - 78:12	Wong, Sunny 2026-01-07	00:00:09	WS17_v7p-As-Pla yedinCourt1-23-2 6.55
	78:09 Q. And that flagging threshold -- (edited)		
	78:10 just to be very clear, that threshold is set by		
	78:11 Uber, correct?		
	78:12 A. Correct.		
79:07 - 79:10	Wong, Sunny 2026-01-07	00:00:09	WS17_v7p-As-Pla yedinCourt1-23-2 6.56
	79:07 Uber's flagging threshold, that's (edited)		
	79:08 not something that's dictated by law or regulation,		
	79:09 correct?		
	79:10 A. Not that I know of.		
79:22 - 80:15	Wong, Sunny 2026-01-07	00:00:54	WS17_v7p-As-Pla yedinCourt1-23-2 6.57
	79:22 Q. And as long as a -- the S-RAD score for a		
	79:23 potential pairing such as the pairing between		
	79:24 Ms. Dean and Mr. Turay, as long as the S-RAD score		
	79:25 comes in below Uber's flagging threshold, then as		
	80:01 far as S-RAD is concerned, like S-RAD doesn't do		
	80:02 anything else, right?		
	80:03 A. It won't intervene on that particular plan		

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DESIGNATION	SOURCE	DURATION	ID
	80:04 at least, yeah.		
	80:05 Q. It will let that plan go forward, right?		
	80:06 A. It will be eligible as a plan that we		
	80:07 won't downrank, right.		
	80:08 Q. Okay.		
	80:09 A. So yeah.		
	80:10 Q. And in -- right. And in this particular		
	80:11 case, because the score for the pairing between		
	80:12 Ms. Dean and Mr. Turay was below the threshold that		
	80:13 Uber picked, it allowed -- Uber dispatched		
	80:14 Mr. Turay -- Mr. Turay to go pick up Ms. Dean,		
	80:15 right?		
80:17 - 81:02	Wong, Sunny 2026-01-07	00:00:21	WS17_v7p-As-Pla yedinCourt1-23-2 6.58
	80:17 THE WITNESS: Again, there can be other		
	80:18 plans that are available at that time, but S-RAD		
	80:19 didn't do any downranking for this specific plan.		
	80:20 BY MS. WALSH:		
	80:21 Q. Okay. So to say that in normal people		
	80:22 language --		
	80:23 A. Yep.		
	80:24 Q. -- S-RAD went ahead and dispatched		
	80:25 Mr. Turay to pick up Ms. Dean, correct?		
	81:01 A. That was the pairing that got dispatched,		
	81:02 correct.		
81:06 - 81:22	Wong, Sunny 2026-01-07	00:01:00	WS17_v7p-As-Pla yedinCourt1-23-2 6.59
	81:06 Q. Okay. Now, tell us this, Mr. Wong: What		
	81:07 were the scores of other rides, of other pairings		
	81:08 that were available for Ms. Dean that night?		
	81:09 A. I don't have that information.		
	81:10 Q. Okay. So you don't know whether there		
	81:11 were other drivers who were eligible to pick up		
	81:12 Ms. Dean that night who may have had lower S-RAD		
	81:13 scores; is that correct?		
	81:14 A. My understanding is their supply plans for		
	81:15 this particular trip are no longer available. So		
	81:16 it's hard -- I don't know whether or not there were		
	81:17 plans that were lower or potentially higher that		
	81:18 were available at that time.		

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DESIGNATION	SOURCE	DURATION	ID
	81:19 Q. Okay. So whatever information Uber once		
	81:20 had about the other pairings that were potentially		
	81:21 available that night for Ms. Dean, that information		
	81:22 no longer exists; is that right?		
81:24 - 82:06	Wong, Sunny 2026-01-07	00:00:17	WS17_v7p-As-Pla yedinCourt1-23-2 6.60
	81:24 THE WITNESS: That's my understanding due		
	81:25 to data retention policy. So yeah, I'm not aware of		
	82:01 those supply plans being available.		
	82:02 BY MS. WALSH:		
	82:03 Q. So due to data retention policies, that		
	82:04 data no longer exists for the jury to see; is that		
	82:05 right?		
	82:06 A. That's my understanding.		
82:20 - 82:24	Wong, Sunny 2026-01-07	00:00:19	WS17_v7p-As-Pla yedinCourt1-23-2 6.61
	82:20 If, in fact, there were pairings available		
	82:21 that night for Ms. Dean that had lower S-RAD scores		
	82:22 than .81, we're not able to show that to the jury		
	82:23 because, due to Uber's data retention policies, that		
	82:24 information no longer exists, correct?		
83:02 - 83:09	Wong, Sunny 2026-01-07	00:00:14	WS17_v7p-As-Pla yedinCourt1-23-2 6.62
	83:02 THE WITNESS: Again, I'm not -- I don't		
	83:03 have access to those supply plan data because they		
	83:04 don't exist anymore.		
	83:05 BY MS. WALSH:		
	83:06 Q. Okay. As a result of Uber's data		
	83:07 retention policy, correct?		
	83:08 A. Correct.		
	83:09 Q. The data have been deleted, correct?		
83:11 - 83:11	Wong, Sunny 2026-01-07	00:00:01	WS17_v7p-As-Pla yedinCourt1-23-2 6.63
	83:11 THE WITNESS: Correct.		
83:14 - 83:20	Wong, Sunny 2026-01-07	00:00:20	WS17_v7p-As-Pla yedinCourt1-23-2 6.64
	83:14 does Uber have data that would allow us to see if		
	83:15 there were potential pairings that night available		
	83:16 for Ms. Dean where the driver was a woman instead of		
	83:17 a man?		

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DESIGNATION	SOURCE	DURATION	ID
	83:18 A. I don't have that information available.		
	83:19 Q. You don't have that information because of		
	83:20 Uber's data retention policies, correct?		
83:22 - 83:22	Wong, Sunny 2026-01-07	00:00:01	WS17_v7p-As-Pla yedinCourt1-23-2 6.65
	83:22 THE WITNESS: Yes.		
84:04 - 84:05	Wong, Sunny 2026-01-07	00:00:03	WS17_v7p-As-Pla yedinCourt1-23-2 6.66
	84:04 Q. The data has been deleted, correct?		
	84:05 A. Correct.		
84:21 - 85:02	Wong, Sunny 2026-01-07	00:00:20	WS17_v7p-As-Pla yedinCourt1-23-2 6.67
	84:21 You are aware that some Uber drivers (edited)		
	84:22 registered dash cams with Uber, correct?		
	84:23 A. Correct.		
	84:24 Q. Okay. So you are aware that there may		
	84:25 have been drivers driving in Phoenix that night who		
	85:01 were eligible to pick up Ms. Dean who had dash cams,		
	85:02 correct?		
85:05 - 85:15	Wong, Sunny 2026-01-07	00:00:25	WS17_v7p-As-Pla yedinCourt1-23-2 6.68
	85:05 THE WITNESS: Again, I have, you know, no		
	85:06 idea what drivers were available or not available at		
	85:07 that time, given the supply plan data is not		
	85:08 available.		
	85:09 BY MS. WALSH:		
	85:10 Q. Okay. So we can't answer that question		
	85:11 whether there were drivers that night who could have		
	85:12 picked up Ms. Dean who had a dash cam in their car.		
	85:13 We can't answer that question because, due to Uber's		
	85:14 data retention policy, that data no longer exists,		
	85:15 correct?		
85:17 - 85:19	Wong, Sunny 2026-01-07	00:00:04	WS17_v7p-As-Pla yedinCourt1-23-2 6.69
	85:17 THE WITNESS: That's correct.		
	85:18 BY MS. WALSH:		
	85:19 Q. That data has been deleted, correct?		
85:21 - 85:22	Wong, Sunny 2026-01-07	00:00:03	WS17_v7p-As-Pla yedinCourt1-23-2
	85:21 THE WITNESS: Correct. The supply plans		

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DESIGNATION	SOURCE	DURATION	ID
	85:22 for that trip no longer exist.		
97:09 - 97:12	Wong, Sunny 2026-01-07	00:00:09	WS17_v7p-As-Pla yedinCourt1-23-2 6.71
	97:09 Q. And on the screen is Exhibit 3867. I've		
	97:10 also handed you a copy, Mr. Wong. Is this a		
	97:11 document that you've seen before?		
	97:12 A. Yes.		
98:08 - 98:23	Wong, Sunny 2026-01-07	00:00:35	WS17_v7p-As-Pla yedinCourt1-23-2 6.72
	98:08 Q. And if I could direct you to that last		
	98:09 bullet point. Says, "Which advocacy groups did we		
	98:10 talk to?" Did you see that?		
	98:11 A. I do see that.		
	98:12 Q. And do you have an understanding as to		
	98:13 what that is referencing in this document?		
	98:14 A. My understanding from what has been		
	98:15 referenced here, these are the different advocacy		
	98:16 groups. It looks like nine different advocacy		
	98:17 groups that we talked to about S-RAD to understand		
	98:18 any concerns they have, I believe mainly from, you		
	98:19 know, racial discrimination, fairness perspective.		
	98:20 So I think it was important to get a point of view		
	98:21 from them. But it shows that we worked with		
	98:22 multiple advocacy groups to really understand their		
	98:23 point of view.		
98:24 - 98:25	Wong, Sunny 2026-01-07	00:00:05	WS17_v7p-As-Pla yedinCourt1-23-2 6.73
	98:24 Q. And does that list of advocacy groups		
	98:25 extend on to Page 7 of this document?		
99:02 - 99:03	Wong, Sunny 2026-01-07	00:00:03	WS17_v7p-As-Pla yedinCourt1-23-2 6.74
	99:02 THE WITNESS: Yes, it looks like it does,		
	99:03 yes.		
99:18 - 99:22	Wong, Sunny 2026-01-07	00:00:12	WS17_v7p-As-Pla yedinCourt1-23-2 6.75
	99:18 Q. Would it -- based on your understanding		
	99:19 and work with S-RAD, would it be correct or		
	99:20 incorrect if someone said that it was kept a secret		
	99:21 or withheld -- the S-RAD model was withheld from		
	99:22 third-party groups?		

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DESIGNATION	SOURCE	DURATION	ID
99:24 - 100:03	Wong, Sunny 2026-01-07 99:24 THE WITNESS: Yeah, I wouldn't agree with 99:25 that. It was pretty clear that we worked with many 100:01 third-party advocacy groups, over ten, again, really 100:02 to understand their point of view, you know, when we 100:03 were building S-RAD.	00:00:10	WS17_v7p-As-Pla yedinCourt1-23-2 6.76
102:11 - 102:12	Wong, Sunny 2026-01-07 102:11 Q. Okay. I want to show you what is marked 102:12 as Exhibit 3778.	00:00:05	WS17_v7p-As-Pla yedinCourt1-23-2 6.77
102:25 - 103:08	Wong, Sunny 2026-01-07 102:25 Q. And have you seen this document before? 103:01 A. I have. 103:02 Q. And what is this document? 103:03 A. My understanding, this is details of the 103:04 S-RAD scores and relevant thresholds for that 103:05 particular trip, along with the factors or features 103:06 that went into the S-RAD model at that particular 103:07 time, along with the values for those factors at 103:08 that particular time.	00:00:25	WS17_v7p-As-Pla yedinCourt1-23-2 6.78
104:02 - 104:07	Wong, Sunny 2026-01-07 104:02 Q. What was Ms. Dean and (edited) 104:03 Mr. Turay's S-RAD score on November 15th, 2023? 104:04 A. Yeah, their full score -- and it's 104:05 probably going to be longer than this -- the full 104:06 score, at least based on this document, is 104:07 .810984373.	00:00:25	WS17_v7p-As-Pla yedinCourt1-23-2 6.79
104:08 - 104:16	Wong, Sunny 2026-01-07 104:08 Q. Do you have an understanding as to why the 104:09 S-RAD score calculates out so many decimal points? 104:10 A. Yeah. We want to make sure there's 104:11 enough, you know, decimal places for us to capture, 104:12 you know, small changes in the score. There's many 104:13 factors that go into the model, and, you know, we 104:14 want to be able to capture all the movements, and 104:15 requires what are referred to as, you know, high	00:00:27	WS17_v7p-As-Pla yedinCourt1-23-2 6.80

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DESIGNATION	SOURCE	DURATION	ID
105:07 - 105:10	104:16 precision in the measurement of it. Wong, Sunny 2026-01-07 105:07 Q. And what was the nighttime threshold in 105:08 Phoenix on November 15th, 2023? 105:09 A. Yeah, on this particular trip, the 105:10 nighttime threshold was .936161816.	00:00:13	WS17_v7p-As-Pla yedinCourt1-23-2 6.81
106:01 - 106:05	Wong, Sunny 2026-01-07 106:01 BY MS. BLAKE: 106:02 Q. Would it be correct or incorrect to 106:03 interpret the S-RAD score for Mr. Turay and 106:04 Ms. Dean's November 15th, 2023 trip as a probability 106:05 score of sexual assault or sexual misconduct?	00:00:15	WS17_v7p-As-Pla yedinCourt1-23-2 6.82
106:12 - 106:25	Wong, Sunny 2026-01-07 106:12 A. Absolutely not. The S-RAD score (edited) 106:13 ranges from zero to 1, but they should absolutely 106:14 not be interpreted as probabilities. There's no way 106:15 we think there's an 81% chance there's -- you know, 106:16 something might get reported on a particular trip. 106:17 So we know that reports of sexual assaults 106:18 are extremely rare on the platform. We're talking 106:19 about one in over a million trips, so there's no way 106:20 these should be translated into probabilities. Even 106:21 on trips that gets flagged, overwhelmingly nothing 106:22 ever gets reported to us. Right? So it's pretty 106:23 clear that these should not be interpreted as 106:24 probabilities. These are just scores from this 106:25 S-RAD model.	00:00:38	WS17_v7p-As-Pla yedinCourt1-23-2 6.83
107:04 - 107:06	Wong, Sunny 2026-01-07 107:04 Do you have an understanding as to whether 107:05 or not the S-RAD score is a prediction of sexual 107:06 assault or sexual misconduct?	00:00:07	WS17_v7p-As-Pla yedinCourt1-23-2 6.84
107:09 - 107:20	Wong, Sunny 2026-01-07 107:09 THE WITNESS: Absolutely not. Again, I 107:10 mentioned earlier, we look at historic data across 107:11 many groups of factors, including rider factors,	00:00:29	WS17_v7p-As-Pla yedinCourt1-23-2 6.85

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DESIGNATION	SOURCE	DURATION	ID
	107:12 driver factors, and the trip factors. So we try to		
	107:13 understand those conditions and try to understand,		
	107:14 you know, for future trips, how much of those		
	107:15 conditions are we seeing on this particular trip,		
	107:16 and we come up with a score, right?		
	107:17 Again, there's no way for us to predict		
	107:18 the future, right? Reports of sexual assaults are		
	107:19 extremely rare, so there's no way for us to know		
	107:20 what's going to happen on a particular trip.		
107:22 - 107:25	Wong, Sunny 2026-01-07	00:00:07	WS17_v7p-As-Pla yedinCourt1-23-2 6.86
	107:22 Q. And now kind of moving down on this		
	107:23 document, there's a list of S-RAD features. Are you		
	107:24 able to see that?		
	107:25 A. I am.		
108:10 - 109:01	Wong, Sunny 2026-01-07	00:00:51	WS17_v7p-As-Pla yedinCourt1-23-2 6.87
	108:10 -- what are these different (edited)		
	108:11 features that are listed here?		
	108:12 A. Yeah, these are all the different factors		
	108:13 that go into the model, and we see the values for		
	108:14 them also in the document. This goes to the model.		
	108:15 These are the various inputs it uses to cal- -- come		
	108:16 up with a score for us to understand if it's below		
	108:17 or above the threshold.		
	108:18 Q. Okay. And are the features that are		
	108:19 listed here and factored into the S-RAD score, are		
	108:20 those driver-specific?		
	108:21 A. They're not just driver-specific.		
	108:22 Actually, there's three main groups. They were also		
	108:23 capturing rider-related features, driver-level		
	108:24 features, but also the trip-level features as well,		
	108:25 right. So driver is just a -- you know, a portion		
	109:01 of them, yeah.		
109:07 - 109:17	Wong, Sunny 2026-01-07	00:00:32	WS17_v7p-As-Pla yedinCourt1-23-2 6.88
	109:07 Q. Do you have an understanding as to what		
	109:08 information is being utilized in this portion or		
	109:09 this feature of the S-RAD score?		
	109:10 A. So Row 21, it says,		

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DESIGNATION	SOURCE	DURATION	ID
	109:11 "driver_ipc_incident_rate_driver_ao." My 109:12 understanding is that is the lifetime IPC incident 109:13 report rate against this particular driver. 109:14 Q. And do you have an understanding as to 109:15 what that means, in other words, what's being 109:16 factored into that score generally? 109:17 A. Right.		
109:19 - 110:06	Wong, Sunny 2026-01-07	00:00:35	WS17_v7p-As-Pla yedinCourt1-23-2 6.89
	109:19 THE WITNESS: Yep. We are including -- my 109:20 understanding, we are including all the reports 109:21 against the driver and -- in terms of Safety Reports 109:22 that are IPC-related. So this includes invalid 109:23 tickets, valid tickets, but also tickets that 109:24 potentially might have support abuse. So we are 109:25 overly cautious on what we're adding in there. Or 110:01 conservative. 110:02 BY MS. BLAKE: 110:03 Q. And with respect to Row 22, do you have an 110:04 understanding as to what information goes into the 110:05 calculation of the feature value on that feature? 110:06 A. Yeah.		
110:08 - 110:14	Wong, Sunny 2026-01-07	00:00:20	WS17_v7p-As-Pla yedinCourt1-23-2 6.90
	110:08 THE WITNESS: I believe it's a similar 110:09 feature, but it's more targeted at the reports that 110:10 are sexual-related, not just overall IPC-related. 110:11 And again, my understanding, it also includes all 110:12 tickets, valid and also invalid, and potential 110:13 support abuse tickets. So again, we're -- we stay 110:14 extra conservative on what's included there.		
111:02 - 111:05	Wong, Sunny 2026-01-07	00:00:09	WS17_v7p-As-Pla yedinCourt1-23-2 6.91
	111:02 Q. And I'll represent to you that this is 111:03 Exhibit 3778. Does that correlate to what we were 111:04 just looking at? 111:05 A. It does.		
115:03 - 115:24	Wong, Sunny 2026-01-07	00:00:52	WS17_v7p-As-Pla yedinCourt1-23-2 6.92
	115:03 BY MS. BLAKE:		

DESIGNATION	SOURCE	DURATION	ID
	115:04 Q. On this document that's in front of you, 115:05 the demonstrative that is in front of you, what is 115:06 highlighted in green? 115:07 A. What is highlighted in green looks like 115:08 the rider-related features that went to the S-RAD 115:09 model, along with the values for those features, I 115:10 believe, from Ms. Dean. 115:11 Q. Okay. And then in the document in front 115:12 of you or demonstrative in front of you, what is 115:13 highlighted in blue? 115:14 A. Those are the driver-related features that 115:15 went into the model for this particular trip, along 115:16 with the values for the driver, Mr. Turay in this 115:17 case. 115:18 Q. And then what is highlighted in yellow on 115:19 this demonstrative in front of you? 115:20 A. The features that are highlighted in 115:21 yellow are the trip-related features mainly with 115:22 regards to where the trip took place, so mainly 115:23 related to like the city, not related to the rider 115:24 or driver specifically.		
116:13 - 116:19	Wong, Sunny 2026-01-07 116:13 Q. And you were asked questions about supply 116:14 plans earlier. Do you recall that? 116:15 A. I do recall that. 116:16 Q. And you mentioned that -- I believe you 116:17 said Uber doesn't retain the supply plans? 116:18 A. That's right. After 30 days, which is my 116:19 understanding, yeah.	00:00:15	WS17_v7p-As-Pla yedinCourt1-23-2 6.93
116:24 - 117:15	Wong, Sunny 2026-01-07 116:24 Q. Do (edited) 116:25 you have an understanding as to why Uber does not 117:01 retain supply plans? 117:02 A. Yeah, my understanding is just, again, we 117:03 retain 30 days of supply plans, not to say we don't 117:04 retain any supply plans. It's just that that's a 117:05 lot of data. I mean, at our scale now, we're doing 117:06 billions and billions of trips, you know, pretty	00:00:36	WS17_v7p-As-Pla yedinCourt1-23-2 6.94

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DESIGNATION	SOURCE	DURATION	ID
	117:07 regularly now. And for each trips, we're talking		
	117:08 about many, many possible supply plans. So that's a		
	117:09 lot of data.		
	117:10 And I'm not an expert in that space. My		
	117:11 understanding is it may be because of like storage		
	117:12 costs and retention, right? So there's a balance we		
	117:13 need in terms of like how long we keep data. It's		
	117:14 just a lot of data given the scale that we're at		
	117:15 right now.		
121:02 - 121:03	Wong, Sunny 2026-01-07 - WIT MP4	00:00:00	WS17_v7p-As-Pla
	121:02 (Whereupon Exhibit 3868 was marked for		yedinCourt1-23-2
	121:03 identification.)		6.95
122:10 - 122:25	Wong, Sunny 2026-01-07	00:00:44	WS17_v7p-As-Pla
	122:10 Q. And what is being shown with respect to		yedinCourt1-23-2
	122:11 the safety impact on S-RAD, based on your		6.96
	122:12 understanding?		
	122:13 A. Yeah, seemed like there are three main		
	122:14 metrics they were looking at. The first one is the		
	122:15 serious sexual assault/serious misconduct rate.		
	122:16 Looks like they were able to observe a 15% reduction		
	122:17 in that rate as part of this experiment.		
	122:18 Also, they were able to measure serious		
	122:19 interpersonal conflict rate and the impact to that,		
	122:20 and they were able to see a minus-13% reduction in		
	122:21 that as part of that experiment.		
	122:22 And then lastly, they were able to		
	122:23 calculate the impact to overall interpersonal		
	122:24 conflict rate, and where they measured a minus-5% in		
	122:25 overall IPC rate reduction.		
123:03 - 123:05	Wong, Sunny 2026-01-07	00:00:06	WS17_v7p-As-Pla
	123:03 Can you explain to the jury what your		yedinCourt1-23-2
	123:04 understanding of what this means in terms of whether		6.97
	123:05 or not S-RAD is effective?		
123:08 - 123:13	Wong, Sunny 2026-01-07	00:00:17	WS17_v7p-As-Pla
	123:08 THE WITNESS: My takeaway from reviewing		yedinCourt1-23-2
	123:09 the slide is that there is safety impact from the		6.98

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DESIGNATION	SOURCE	DURATION	ID
	123:10 S-RAD model. I mean, they have a headline there		
	123:11 that says "Strong safety impact in the U.S." from		
	123:12 this experiment, but my assessment is that there is		
	123:13 safety impact based on this analysis, yeah.		
124:15 - 124:19	Wong, Sunny 2026-01-07	00:00:09	WS17_v7p-As-Pla
	124:15 BY MS. BLAKE:		yedinCourt1-23-2
			6.99
	124:16 Q. Mr. Wong, is there anything that you'd		
	124:17 like the jury to know about S-RAD that we haven't		
	124:18 talked about today or you haven't been able to speak		
	124:19 about today?		
124:22 - 125:09	Wong, Sunny 2026-01-07	00:00:31	WS17_v7p-As-Pla
	124:22 THE WITNESS: I would say, again, S-RAD		yedinCourt1-23-2
			6.100
	124:23 has, again, proven from even the earlier days, that		
	124:24 there's, you know, safety impact to it. We continue		
	124:25 to invest in S-RAD. We've made different		
	125:01 improvements to the model. We've launched, you		
	125:02 know, updates to the model, even over the last year,		
	125:03 and we continue to focus on improving it.		
	125:04 Again, the work doesn't stop, whether it's		
	125:05 S-RAD or a broader focus on safety, right? So		
	125:06 again, that's something we're really proud of, and		
	125:07 I'm very grateful to be able to work on a program		
	125:08 like S-RAD, in addition to all the other safety work		
	125:09 my team gets to work on.		
137:02 - 137:10	Wong, Sunny 2026-01-07	00:00:28	WS17_v7p-As-Pla
	137:02 Q. Okay. The trip trigger rate, that		yedinCourt1-23-2
			6.101
	137:03 represents the percentage of trips that S-RAD will		
	137:04 at least theoretically flag to intervene in, right?		
	137:05 A. That's roughly correct, yeah.		
	137:06 Q. Okay. Well, the trip -- let me ask you		
	137:07 again, then. The trip trigger rate, that represents		
	137:08 the percentage of trips that will theoretically be		
	137:09 flagged as a result of S-RAD, right?		
	137:10 A. Right.		
137:16 - 137:23	Wong, Sunny 2026-01-07	00:00:21	WS17_v7p-As-Pla
	137:16 Q. A way that Uber could increase the (edited)		yedinCourt1-23-2
			6.102

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DESIGNATION	SOURCE	DURATION	ID
	137:17 percent of trips affected by S-RAD is by increasing 137:18 the trip trigger rate, right? 137:19 A. That will lead to more trips being 137:20 potentially flagged, correct. 137:21 Q. Okay. Well, the way Uber increases the 137:22 percent of trips affected by S-RAD is by increasing 137:23 the trip trigger rate, right?		
137:25 - 137:25	Wong, Sunny 2026-01-07 137:25 THE WITNESS: Correct.	00:00:01	WS17_v7p-As-Pla yedinCourt1-23-2 6.103
139:08 - 139:17	Wong, Sunny 2026-01-07 139:08 Q. For 2023, Mr. Wong, the overall (edited) 139:09 trigger rate that Uber used for the entire United 139:10 States was 1.25%, right? 139:11 A. Right. 139:12 Q. Okay. Now, the trigger rate might be 139:13 different for daytime versus nighttime, right? 139:14 A. That's correct. 139:15 Q. And it might be different for different 139:16 cities, correct? 139:17 A. That's correct.	00:00:23	WS17_v7p-As-Pla yedinCourt1-23-2 6.104
142:01 - 142:08	Wong, Sunny 2026-01-07 142:01 you had calculated the trigger rate (edited) 142:02 for nighttime in Phoenix at the time of Ms. Dean's 142:03 ride and found it to be roughly 3%? 142:04 A. Sounds about right, yes. Yeah. 142:05 Q. Okay. And what that means is that S-RAD 142:06 was calibrated to flag the top 3% riskiest rides, 142:07 right? 142:08 A. Nighttime rides at that period of time.	00:00:25	WS17_v7p-As-Pla yedinCourt1-23-2 6.105
143:13 - 143:18	Wong, Sunny 2026-01-07 143:13 Q. Okay. S-RAD could have been calibrated so 143:14 that it targeted the top 20% of rider-driver 143:15 pairings, correct? I'm just asking you, is that 143:16 theoretically possible that it could have done that? 143:17 A. Theoretically, you can set another trigger 143:18 rate, theoretically.	00:00:20	WS17_v7p-As-Pla yedinCourt1-23-2 6.106

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DESIGNATION	SOURCE	DURATION	ID
143:19 - 143:21	Wong, Sunny 2026-01-07 143:19 Q. Okay. Uber could have set the trigger 143:20 rate at 15% to target the top 15% rides in terms of 143:21 risk score, right?	00:00:11	WS17_v7p-As-Pla yedinCourt1-23-2 6.107
143:23 - 144:09	Wong, Sunny 2026-01-07 143:23 THE WITNESS: Again, you're casting a 143:24 wider net. Of course you're potentially 143:25 identifying, you know, more trips, right, and 144:01 potentially -- you know, again, more trips, right. 144:02 It doesn't necessarily mean it will lead into 144:03 incident reduction or prevention because, again, you 144:04 will downrank certain plans, and there potentially 144:05 will be another driver that will be matched to this 144:06 particular rider, and it's certainly possible that a 144:07 report could still get reported on that particular 144:08 trip. So there's no way for us to know what will 144:09 happen in that case.	00:00:28	WS17_v7p-As-Pla yedinCourt1-23-2 6.108
145:13 - 145:14	Wong, Sunny 2026-01-07 145:13 Q. Uber could have set the trip (edited) 145:14 trigger rate at 10% instead of just 3%, correct?	00:00:06	WS17_v7p-As-Pla yedinCourt1-23-2 6.109
145:16 - 145:16	Wong, Sunny 2026-01-07 145:16 THE WITNESS: Theoretically, yes (edited)	00:00:01	WS17_v7p-As-Pla yedinCourt1-23-2 6.110
148:07 - 148:13	Wong, Sunny 2026-01-07 148:07 Q. Okay. Mr. Wong, let me ask the question 148:08 one more time. Okay? You know, from your 148:09 involvement in internal Uber documents, that when 148:10 Uber's considering how to set the trip trigger rate, 148:11 one of the things that it takes into account is that 148:12 it does not want to hurt the Uber marketplace, 148:13 correct?	00:00:20	WS17_v7p-As-Pla yedinCourt1-23-2 6.111
148:17 - 148:17	Wong, Sunny 2026-01-07 148:17 THE WITNESS: No, I don't agree with that.	00:00:01	WS17_v7p-As-Pla yedinCourt1-23-2 6.112
150:13 - 150:14	Wong, Sunny 2026-01-07	00:00:04	WS17_v7p-As-Pla

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DESIGNATION	SOURCE	DURATION	ID
	150:13 Q. Okay. Let's look at a document that was		yedinCourt1-23-2 6.113
	150:14 found in your files. (edited)		
150:19 - 150:19	Wong, Sunny 2026-01-07	00:00:05	WS17_v7p-As-Pla yedinCourt1-23-2 6.114
	150:19 Q. And if you just stay on that first page,		
150:20 - 151:06	Wong, Sunny 2026-01-07	00:00:34	WS17_v7p-As-Pla yedinCourt1-23-2 6.115
	150:20 please, for a moment. And you can see, Mr. Wong,		
	150:21 that this is a document from the metadata here that		
	150:22 was created December 11th, 2023. Do you see that?		
	150:23 A. Yes.		
	150:24 Q. And do you see the field called		
	150:25 "Collaborators"?		
	151:01 A. Yes, I do see the field.		
	151:02 Q. Okay. And do you see that you are		
	151:03 identified as one of the collaborators in this		
	151:04 document?		
	151:05 A. Yes.		
	151:06 Q. Okay. And if you go with me to PDF 23 of		
151:07 - 151:14	Wong, Sunny 2026-01-07	00:00:18	WS17_v7p-As-Pla yedinCourt1-23-2 6.116
	151:07 this document, do you see where it says "P95 ETA		
	151:08 Impact"?		
	151:09 A. I do see that, yes.		
	151:10 Q. And that's one of the things mentioned		
	151:11 under "S-RAD Main Metrics." Do you see that?		
	151:12 A. Yes.		
	151:13 Q. And do you see where it says "We seek to		
	151:14 avoid hurting the marketplace"?		
152:23 - 152:25	Wong, Sunny 2026-01-07	00:00:06	WS17_v7p-As-Pla yedinCourt1-23-2 6.117
	152:23 Q. Those are the words that appear in this		
	152:24 internal Uber document; is that correct?		
	152:25 A. It is on the document.		
155:13 - 155:16	Wong, Sunny 2026-01-07	00:00:07	WS17_v7p-As-Pla yedinCourt1-23-2 6.118
	155:13 Do you see that (edited)		
	155:14 this is an e-mail chain from April 2021? Do you see		
	155:15 that?		

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DESIGNATION	SOURCE	DURATION	ID
	155:16 A. Yes.		
157:13 - 157:25	Wong, Sunny 2026-01-07 157:13 Q. Well, you know who Dharmin is, (edited) 157:14 correct? 157:15 A. I do. He's a product manager. 157:16 Q. Okay. And if we look at the last 157:17 paragraph shown on this page in this e-mail, he 157:18 says, "We target a 1.25% trip trigger rate running 157:19 these models, which are indicated by square markers 157:20 on the curves. This trigger-rate budget has been 157:21 determined based on the results of our prior 157:22 experiments and input from marketplace ops in a way 157:23 to limit the potential negative marketplace impact." 157:24 Do you see that? 157:25 A. I do see that.	00:00:36	WS17_v7p-As-Pla yedinCourt1-23-2 6.119
160:13 - 160:17	Wong, Sunny 2026-01-07 - WIT MP4 160:13 Q. Let's take a look on this topic of (edited) 160:14 whether the marketplace figures into how you all set 160:15 the trip trigger rate for S-RAD. Let's look at a 160:16 document that your own lawyer, the lawyer for Uber, 160:17 chose to show you. Okay?	00:00:18	WS17_v7p-As-Pla yedinCourt1-23-2 6.120
160:23 - 160:24	Wong, Sunny 2026-01-07 - WIT MP4 160:23 Q. Did you review that document before you 160:24 came and talked to the jury about it?	00:00:04	WS17_v7p-As-Pla yedinCourt1-23-2 6.121
162:05 - 162:06	Wong, Sunny 2026-01-07 162:05 MS. WALSH: Okay. Let's pull up Trial 162:06 Exhibit 03867.	00:00:05	WS17_v7p-As-Pla yedinCourt1-23-2 6.122
162:07 - 162:09	Wong, Sunny 2026-01-07 162:07 BY MS. WALSH: 162:08 Q. You recall this document, correct? 162:09 A. Yes.	00:00:05	WS17_v7p-As-Pla yedinCourt1-23-2 6.123
163:18 - 164:21	Wong, Sunny 2026-01-07 163:18 This is what we've been (edited)	00:01:12	WS17_v7p-As-Pla yedinCourt1-23-2 6.124

DESIGNATION	SOURCE	DURATION	ID
	163:19 talking about, right? "How do you decide the trip		
	163:20 trigger rate?" Do you see that?		
	163:21 A. I do see that.		
	163:22 Q. And it says, "We work with individual		
	163:23 regional teams to determine at a trigger rate" -- "a		
	163:24 trigger rate strikes a good balance between safety		
	163:25 and marketplace metrics." Do you see that?		
	164:01 A. I do see that.		
	164:02 Q. It says, "Along these lines, we have		
	164:03 conducted a number of experiments at various trigger		
	164:04 rates to determine the impact on marketplace metrics		
	164:05 such as p99 ETA." Do you see that?		
	164:06 A. I do see that.		
	164:07 Q. And that's the same metric that was		
	164:08 mentioned in the document we looked at earlier,		
	164:09 right?		
	164:10 A. Yeah, that's one of a few metrics that we		
	164:11 monitor.		
	164:12 Q. Okay. "C/R, unfulfilled, cancellation		
	164:13 rates, et cetera." Do you see that?		
	164:14 A. I do see that.		
	164:15 Q. And then the last bullet says, "How do we		
	164:16 calibrate the threshold?" It says, "Thresholds are		
	164:17 determined based on trigger rates agreed up with		
	164:18 regional teams. We actively monitor the S-RAD		
	164:19 actions and update when we see actions outside the		
	164:20 guardrails." Do you see that?		
	164:21 A. I do see that.		
165:07 - 165:15	Wong, Sunny 2026-01-07	00:00:28	WS17_v7p-As-Pla yedinCourt1-23-2 6.125
	165:07 Q. Okay. And the next question, on the next		
	165:08 page, it's talking about "Is 15 to 18% recall the		
	165:09 ceiling for the model?" Do you see that?		
	165:10 A. Yes.		
	165:11 Q. And what it says is, "No. If we increase		
	165:12 the percentage of trips affected by S-RAD, we can		
	165:13 increase the recall for the model." Do you see		
	165:14 that?		
	165:15 A. Yes.		
167:14 - 167:20	Wong, Sunny 2026-01-07	00:00:20	WS17_v7p-As-Pla

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DESIGNATION	SOURCE	DURATION	ID
	167:14 Q. going back to this (edited)		yedinCourt1-23-2 6.126
	167:15 document, the question is asked if the recall of 15		
	167:16 to 18% is the ceiling, and the answer is "No." But		
	167:17 what the second sentence in that paragraph says,		
	167:18 "However, it also means that we will see a higher		
	167:19 impact on marketplace metrics," correct?		
	167:20 A. I do see that.		
171:11 - 171:14	Wong, Sunny 2026-01-07	00:00:16	WS17_v7p-As-Pla yedinCourt1-23-2 6.127
	171:11 What was not considered in calculating the		
	171:12 S-RAD score is -- was the fact that the background		
	171:13 check for Mr. Turay did not go back his entire		
	171:14 lifetime. Do you see that anywhere on this list?		
171:16 - 171:24	Wong, Sunny 2026-01-07	00:00:20	WS17_v7p-As-Pla yedinCourt1-23-2 6.128
	171:16 THE WITNESS: I don't see any background		
	171:17 check-related features on this list.		
	171:18 BY MS. WALSH:		
	171:19 Q. Okay. So the fact that because Mr. Turay		
	171:20 only arrived in the country in 2013, and therefore		
	171:21 Uber couldn't do a background check for certain		
	171:22 heinous crimes for his entire life, that's not		
	171:23 reflected -- that was not taken into account by		
	171:24 S-RAD, correct?		
172:02 - 172:03	Wong, Sunny 2026-01-07	00:00:03	WS17_v7p-As-Pla yedinCourt1-23-2 6.129
	172:02 THE WITNESS: There weren't any background		
	172:03 check-related features in the model at that time.		
173:01 - 173:04	Wong, Sunny 2026-01-07	00:00:08	WS17_v7p-As-Pla yedinCourt1-23-2 6.130
	173:01 Q. Okay. What about information about how		
	173:02 many times people had vomited in Mr. Turay's car?		
	173:03 Was that taken into account in calculating the risk		
	173:04 score?		
173:06 - 173:17	Wong, Sunny 2026-01-07	00:00:27	WS17_v7p-As-Pla yedinCourt1-23-2 6.131
	173:06 THE WITNESS: That's not one of the		
	173:07 features on this list.		
	173:08 BY MS. WALSH:		

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DESIGNATION	SOURCE	DURATION	ID
	173:09 Q. Okay. What about feedback tags that had 173:10 been given for Mr. Turay? Is that taken into 173:11 account in calculating the S-RAD score? 173:12 A. That's not one of the features on this 173:13 list. 173:14 Q. Okay. What about the number of times that 173:15 Mr. Turay had had long stops during rides, including 173:16 rides that he was giving at night? Is that 173:17 reflected in this feature list?		
173:19 - 174:04	Wong, Sunny 2026-01-07 173:19 THE WITNESS: How is "long stop" defined? 173:20 What do you mean by that? That's not one of the 173:21 features on the list. 173:22 BY MS. WALSH: 173:23 Q. That's all I'm asking. The jury will hear 173:24 evidence and know what it is. Do you see that 173:25 feature? 174:01 A. That's not one of the features here. 174:02 Q. Okay. What about the number of times on 174:03 rides at night that Mr. Turay ended rides early? Is 174:04 that reflected on this feature list?	00:00:21	WS17_v7p-As-Pla yedinCourt1-23-2 6.132
174:06 - 174:10	Wong, Sunny 2026-01-07 174:06 THE WITNESS: It is not. 174:07 BY MS. WALSH: 174:08 Q. What about the number of times that 174:09 Mr. Turay canceled late-night rides when the rider 174:10 was a male? Is that reflected on this list?	00:00:12	WS17_v7p-As-Pla yedinCourt1-23-2 6.133
174:12 - 174:12	Wong, Sunny 2026-01-07 174:12 THE WITNESS: It is not.	00:00:01	WS17_v7p-As-Pla yedinCourt1-23-2 6.134

PLF Affirmative	00:29:56
DEF Affirmative	00:09:20
DEF Counter	00:02:02
TOTAL RUN TIME	00:41:18