

COURT EXHIBIT 6A

Designation Run Report for Rebecca Payne
as played in Court 01/20/2026 (04-2-3-2025, 5-13-2025)

Payne, Rebecca April/May 2025 - v11p As-Played in Court 01/20/2026

Designation List Report

	Payne, Rebecca	2025-04-02
	Payne, Rebecca	2025-04-02
	Payne, Rebecca	2025-04-03
	Payne, Rebecca	2025-04-03
	Payne, Rebecca	2025-05-13
	Payne, Rebecca	2025-05-13

PLF Affirmative	00:52:42
DEF Counter	00:07:13
Overlaps	00:00:15
TOTAL RUN TIME	01:00:11



PR_v11p_As-PlayedinCourt1202026 - Payne, Rebecca April/May 2025 - v11p As-Played in Court 01/20/2026

DESIGNATION	SOURCE	DURATION	ID
13:09 - 13:11	Payne, Rebecca 2025-04-02 - PIP MP4 13:09 Q. Can you please state your name for the 13:10 record? 13:11 A. Rebecca Payne.	00:00:03	PR_v11p_As-Play edinCourt120202 6.1
14:09 - 14:11	Payne, Rebecca 2025-04-02 - PIP MP4 14:09 Q. Ms. Payne, you are currently employed at 14:10 Uber, the defendant in this case, right? 14:11 A. Yes.	00:00:05	PR_v11p_As-Play edinCourt120202 6.2
20:02 - 20:04	Payne, Rebecca 2025-04-02 - WIT MP4 20:02 Q. You are here today on behalf of Uber, the 20:03 corporation, not yourself as an individual, correct? 20:04 A. Correct.	00:00:06	PR_v11p_As-Play edinCourt120202 6.3
21:03 - 21:09	Payne, Rebecca 2025-04-02 - WIT MP4 21:03 Q. And you know that Uber is presenting you 21:04 to answer questions under oath on behalf of the 21:05 company, right? 21:06 A. Yes. 21:07 Q. Do you take that responsibility to answer 21:08 questions on behalf of Uber under oath seriously? 21:09 A. Yes.	00:00:11	PR_v11p_As-Play edinCourt120202 6.4
241:21 - 241:24	Payne, Rebecca 2025-04-02 - WIT MP4 241:21 Q. And so the jury's clear, as we sit here 241:22 today in April 2025, Uber does not provide its women 241:23 drivers in the United States with an option to 241:24 choose or prefer a woman passenger, right?	00:00:12	PR_v11p_As-Play edinCourt120202 6.5
242:01 - 242:01	Payne, Rebecca 2025-04-02 - WIT MP4 242:01 THE WITNESS: Correct.	00:00:01	PR_v11p_As-Play edinCourt120202 6.6
242:03 - 242:10	Payne, Rebecca 2025-04-02 - WIT MP4 242:03 Q. And Uber has never provided its women 242:04 drivers in the United States with such an option, 242:05 correct? 242:06 A. Correct.	00:00:18	PR_v11p_As-Play edinCourt120202 6.7

PR_v11p_As-PlayedinCourt1202026 - Payne, Rebecca April/May 2025 - v11p As-Played in Court 01/20/2026

DESIGNATION	SOURCE	DURATION	ID
	242:07 Q. And as we sit here today in April 2025,		
	242:08 Uber does not provide its women passengers in the		
	242:09 United States with an option to choose or prefer a		
	242:10 woman driver, right?		
242:12 - 242:12	Payne, Rebecca 2025-04-02 - WIT MP4	00:00:01	PR_v11p_As-Play
	242:12 THE WITNESS: Correct.		edinCourt120202
			6.8
242:14 - 242:16	Payne, Rebecca 2025-04-02 - WIT MP4	00:00:07	PR_v11p_As-Play
	242:14 Q. And Uber has never provided its women		edinCourt120202
	242:15 passengers in the United States with such an option,		6.9
	242:16 right?		
242:18 - 242:18	Payne, Rebecca 2025-04-02 - WIT MP4	00:00:01	PR_v11p_As-Play
	242:18 THE WITNESS: Correct.		edinCourt120202
			6.10
257:25 - 258:04	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:17	PR_v11p_As-Play
	257:25 Q. So currently, the only way for an Uber		edinCourt120202
	258:01 woman passenger to express a preference for a woman		6.11
	258:02 Uber driver is just to keep on canceling the ride if		
	258:03 they see it's a male, right?		
	258:04 A. They could do that. I think that the (edited)		
258:05 - 258:06	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:10	PR_v11p_As-Play
	258:05 percentage of women drivers on the Uber platform is		edinCourt120202
	258:06 minimal, so it's not the easiest thing to do.		6.12
258:23 - 259:04	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:27	PR_v11p_As-Play
	258:23 When was the first time that Uber internally (edited)		edinCourt120202
	258:24 began discussing an option where female passengers		6.13
	258:25 or drivers would have the ability to choose or		
	259:01 prefer a woman driver or passenger?		
	259:02 A. I don't know the first date of an		
	259:03 individual conversation, but I know it was being		
	259:04 talked about when I joined the company in 2018.		
259:18 - 259:20	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:07	PR_v11p_As-Play
	259:18 Q. Okay. So this is a document from August		edinCourt120202
	259:19 of 2016. Do you see that?		6.14

DESIGNATION	SOURCE	DURATION	ID
	259:20 A. Yes.		
260:06 - 261:15	Payne, Rebecca 2025-04-02 - PIP MP4	00:01:29	PR_v11p_As-Play edinCourt120202 6.15
	260:06 Q. And if we turn the page, the first page		
	260:07 says "Women's Safety Engagement Plan." Do you see		
	260:08 that?		
	260:09 A. Yes.		
	260:10 Q. Under "Background" it says, "In many		
	260:11 places around the world, our opponents often cite		
	260:12 singular incidents involving women as a reason why		
	260:13 Uber is not safe. The perception that Uber is		
	260:14 unsafe for women has been a significant issue for		
	260:15 policy and PR in places including," and then it		
	260:16 lists a few places. Do you see that?		
	260:17 A. Yes.		
	260:18 Q. And then the paragraph below that, it		
	260:19 says, "The critique of our safety standard,		
	260:20 particular with regards to women, is exacerbated by		
	260:21 the emergence of women-only ridesharing services in		
	260:22 Boston and LA as well as women-only taxi in India.		
	260:23 We are increasingly asked if Uber will offer women		
	260:24 riders the option to ride with only women drivers."		
	260:25 Do you see that?		
	261:01 A. Yes.		
	261:02 Q. And again, this is August 2016, correct?		
	261:03 A. Correct.		
	261:04 Q. And then in this Women's Safety Engagement		
	261:05 Plan for Uber, the next paragraph says, "To turn		
	261:06 this narrative around, we need to activate thought		
	261:07 leaders on women's safety who can a) contextualize		
	261:08 violence against women as a systemic issue that		
	261:09 extends beyond Uber in every region (see appendix);		
	261:10 challenge the notion that 'separate-but-equal'		
	261:11 transit equates safety for women; and c) validate		
	261:12 that Uber takes this problem seriously and that our		
	261:13 technology is part of the solution." Do you see		
	261:14 that?		
	261:15 A. I do.		
261:22 - 262:06	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:22	PR_v11p_As-Play edinCourt120202
	261:22 Q. And the last paragraph, can you read that		

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DESIGNATION	SOURCE	DURATION	ID
	261:23 for the jury?		
	261:24 A. The one right under that?		
	261:25 Q. Yes, ma'am.		
	262:01 A. "Doing so will make it harder for		
	262:02 opponents to build alliances with women's groups and		
	262:03 argue that Uber is dangerous in comparison to other		
	262:04 transportation options. This will help us push back		
	262:05 on opponents who say that fingerprinting and/or		
	262:06 women-only services make women safer."		
262:07 - 262:09	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:08	PR_v11p_As-Play edinCourt120202 6.17
	262:07 Q. Okay. So at this time in 2016, there were		
	262:08 some smaller ridesharing companies beginning to		
	262:09 offer a women-matching option, right?		
262:11 - 262:12	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:03	PR_v11p_As-Play edinCourt120202 6.18
	262:11 THE WITNESS: I believe so, yes, in some		
	262:12 small capacity.		
262:18 - 262:22	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:13	PR_v11p_As-Play edinCourt120202 6.19
	262:18 Q. And in 2016, according to this Women's		
	262:19 Safety Engagement Plan, Uber's strategy regarding a		
	262:20 women-matching option was to push back on opponents		
	262:21 who said that women-only services make women safer,		
	262:22 right?		
262:24 - 262:25	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:03	PR_v11p_As-Play edinCourt120202 6.20
	262:24 THE WITNESS: I think that's what's stated		
	262:25 here. I think it's a broader kind of issue from (edited)		
263:01 - 263:03	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:13	PR_v11p_As-Play edinCourt120202 6.21
	263:01 that. There's a lot of technical considerations of		
	263:02 feasibility of offering these services. And so I		
	263:03 think this is maybe a bit limiting.		
283:15 - 283:15	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:03	PR_v11p_As-Play edinCourt120202 6.22
	283:15 MR. ABRAMSON: Okay. Let's move to 2019.		
301:05 - 301:07	Payne, Rebecca 2025-04-02 - WIT MP4	00:00:11	PR_v11p_As-Play edinCourt120202
	301:05 Q. And this is a October 2019 document from		

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DESIGNATION	SOURCE	DURATION	ID
	301:06 the account of Mr. Fuldner. Do you see that?		
	301:07 A. Yes.		
301:14 - 302:04	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:33	PR_v11p_As-Play edinCourt120202 6.24
	301:14 It says, "Safety Product Jam with (edited)		
	301:15 Chris Cox/Takeaways." And we just saw that,		
	301:16 according to his LinkedIn, Chris Cox is an Uber		
	301:17 expert, right?		
	301:18 A. According to his LinkedIn.		
	301:19 Q. And it looks like there was a meeting on		
	301:20 October 17th that involved Chris, Dara -- that would		
	301:21 be the CEO, right?		
	301:22 A. Yes.		
	301:23 Q. Jill, that's Jill Hazelbaker, right?		
	301:24 A. Yes.		
	301:25 Q. Gus, that's Gus Fuldner, right?		
	302:01 A. Yes.		
	302:02 Q. Sachin, that's Sachin Kansal, the chief		
	302:03 product officer, right? Not at that time, but...		
	302:04 A. Not at that time, but yes.		
303:05 - 303:13	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:23	PR_v11p_As-Play edinCourt120202 6.25
	303:05 Q. And at the very bottom on -- under -- on		
	303:06 "On Women Driving Women," can you please read to the		
	303:07 jury what the takeaway was?		
	303:08 A. "Yes this could affect marketplace (more		
	303:09 expensive trips, longer ETAs) but in the end, we		
	303:10 should let women/customers make the call and the		
	303:11 decision."		
	303:12 Q. And at least as of 2019 in the United		
	303:13 States, that did not happen, correct?		
303:15 - 303:15	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:01	PR_v11p_As-Play edinCourt120202 6.26
	303:15 THE WITNESS: Correct.		
304:06 - 304:07	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:05	PR_v11p_As-Play edinCourt120202 6.27
	304:06 Q. We're going to move forward a year (edited)		
	304:07 now, and we're going to go to the year 2020. Okay?		
304:16 - 304:19	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:12	PR_v11p_As-Play edinCourt120202

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DESIGNATION	SOURCE	DURATION	ID
	304:16 Q. Okay. So if we start at the metadata, we		6.28
	304:17 see that this is a document that was created		
	304:18 June 30th, 2020. Do you see that?		
	304:19 A. Yes.		
304:23 - 305:03	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:12	PR_v11p_As-Play edinCourt120202 6.29
	304:23 Q. "WRP," that's "Women Rider Preferred,"		
	304:24 right?		
	304:25 A. Or "Women Rider Preference," yes.		
	305:01 Q. "Women Rider Preference" or "Women Rider		
	305:02 Preferred US Launch Decision," right?		
	305:03 A. Yes.		
305:14 - 305:20	Payne, Rebecca 2025-04-02 - WIT MP4	00:00:18	PR_v11p_As-Play edinCourt120202 6.30
	305:14 Q. It says, "As it relates to the US, we		
	305:15 proposed to launch in around 4 cities in the second		
	305:16 half of 2020 as part of our 'phase 1' pilot. These		
	305:17 cities were chosen from a shortlist." And it lists,		
	305:18 "Jacksonville," "Phoenix," "San Antonio," and		
	305:19 "Memphis," right?		
	305:20 A. Yes.		
306:21 - 308:06	Payne, Rebecca 2025-04-02 - WIT MP4	00:01:32	PR_v11p_As-Play edinCourt120202 6.31
	306:21 Q. And then if we go to the next page under		
	306:22 "Comms," and we have what looks like notes from		
	306:23 Andrew. Is that Andrew Hasbun?		
	306:24 A. Yes.		
	306:25 Q. And Kayla, is that Kayla Whaling?		
	307:01 A. Yes.		
	307:02 Q. And Andrew, the note says, "Fully support		
	307:03 launching as planned with a September target,"		
	307:04 right?		
	307:05 A. Yes.		
	307:06 Q. And if you go down below, he says, "Am not		
	307:07 supportive of a pilot in a Western English speaking		
	307:08 market. This will draw attention to the feature and		
	307:09 create a drumbeat for the feature in the US which		
	307:10 could give Lyft the chance to literally steal the		
	307:11 feature from under us. This has happened with other		
	307:12 features and we should have the same expectation		

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DESIGNATION	SOURCE	DURATION	ID
	307:13 here. No Western/English speaking country should go		
	307:14 before the US." Underlined, "Being first matters		
	307:15 especially with a groundbreaking feature like this."		
	307:16 That's what he said, right?		
	307:17 A. That's what he said in this document, yes.		
	307:18 Q. Under "Global Women's Safety," that's		
	307:19 Brittany Anthony and Tracey Breeden?		
	307:20 A. Yes.		
	307:21 Q. And Tracey says, "Fully support launching		
	307:22 in all countries as planned, including the US,"		
	307:23 right?		
	307:24 A. Yes.		
	307:25 Q. And she says she agrees with comms, "we		
	308:01 should not be launching in any English speaking		
	308:02 countries before the US. It will cause swirl and		
	308:03 give competitors an advantage. I'm very concerned		
	308:04 Lyft and Didi may launch before us if we delay too		
	308:05 long." Right?		
	308:06 A. Yes.		
308:15 - 308:17	Payne, Rebecca 2025-04-02 - WIT MP4	00:00:07	PR_v11p_As-Play edinCourt120202 6.32
	308:15 Q. Well, you're here on behalf of Uber, so		
	308:16 was Uber concerned in 2020 about Lyft moving first		
	308:17 with respect to a women-matching option?		
308:19 - 308:23	Payne, Rebecca 2025-04-02 - WIT MP4	00:00:20	PR_v11p_As-Play edinCourt120202 6.33
	308:19 THE WITNESS: I think individuals at Uber		
	308:20 were concerned, as shown here. It's hard to say the		
	308:21 exact position of Uber, but I think it is one of the		
	308:22 inputs considered as we had lots of serious		
	308:23 discussions about these features and products.		
308:25 - 309:13	Payne, Rebecca 2025-04-02 - WIT MP4	00:00:31	PR_v11p_As-Play edinCourt120202 6.34
	308:25 Q. Under "US Ops," it says, "Nick and (edited)		
	309:01 Bushra." Who's Nick?		
	309:02 A. Nick Murphy, I believe.		
	309:03 Q. And then Bushra Faiz, right?		
	309:04 A. Yes.		
	309:05 Q. And they say, "US Safety Ops is generally		
	309:06 aligned to exploring the launch in the US to test		

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DESIGNATION	SOURCE	DURATION	ID
	309:07 the impact on IPC rate and women driver growth."		
	309:08 Right?		
	309:09 A. Yes.		
	309:10 Q. So one of the things that US Safety Ops		
	309:11 was going to look at with respect to a		
	309:12 female-matching option was the impact on the		
	309:13 interpersonal conflict rate, right?		
309:15 - 309:16	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:04	PR_v11p_As-Play edinCourt120202 6.35
	309:15 THE WITNESS: Yes, that would have been		
	309:16 something that we looked into, yes.		
309:18 - 310:12	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:51	PR_v11p_As-Play edinCourt120202 6.36
	309:18 Q. And again, for the jury's benefit, the		
	309:19 interpersonal conflict rate would include, but not		
	309:20 be limited to incidents of sexual assault and sexual		
	309:21 misconduct, right?		
	309:22 A. Yes.		
	309:23 Q. Now, if we go to the next page, under		
	309:24 "Data points," and the first bullet point says		
	309:25 "Metrics." Do you see that?		
	310:01 A. Yes.		
	310:02 Q. And the third sub-bullet says "Sentiment &		
	310:03 safety." Do you see that?		
	310:04 A. Yes.		
	310:05 Q. And one of the data point metrics that's		
	310:06 listed in this Uber document in 2020 is comparing		
	310:07 safety incidents for WRP, Women Rider Preferred,		
	310:08 trips versus normal trips, right?		
	310:09 A. Yes.		
	310:10 Q. So that was going to be a metric, a data		
	310:11 point, that was analyzed by Uber with respect to a		
	310:12 female-matching option, right?		
310:14 - 310:15	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:08	PR_v11p_As-Play edinCourt120202 6.37
	310:14 THE WITNESS: This was a general proposal		
	310:15 for what could be measured in the event of a launch.		
310:18 - 310:20	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:10	PR_v11p_As-Play edinCourt120202 6.38
	310:18 This is a draft note to Gus Fuldner, (edited)		

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DESIGNATION	SOURCE	DURATION	ID
	310:19 right?		
	310:20 A. Yes, that's what it appears to be.		
310:24 - 311:03	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:13	PR_v11p_As-Play edinCourt120202 6.39
	310:24 Q. Okay. It says under "Hi Gus" -- and this		
	310:25 is talking to Gus Fuldner -- "We wanted to follow up		
	311:01 after the S4S" -- that's a Stand for Safety --		
	311:02 "committee meeting, and get your alignment on a path		
	311:03 forward. Two items to cover." Do you see -- see		
311:04 - 311:21	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:44	PR_v11p_As-Play edinCourt120202 6.40
	311:04 it?		
	311:05 A. Yes.		
	311:06 Q. And the first item is, "US launch: We		
	311:07 believe there are many benefits to testing the		
	311:08 product in the US in September (will go into detail		
	311:09 on those below)," right?		
	311:10 A. Yes.		
	311:11 Q. And then below, under "US launch," can you		
	311:12 read that first paragraph to the jury, please?		
	311:13 A. "As we've seen with many past launches, if		
	311:14 Lyft gets wind of us launching WRP in the US, there		
	311:15 is nothing stopping them from getting the jump on us		
	311:16 and announcing a similar product. We want to make		
	311:17 sure that we get credit for being the first mover		
	311:18 here," in parentheses, "(at least as it relates to		
	311:19 Lyft), even if we want our September announcement to		
	311:20 be more of a pre-announcement. A few reasons to		
	311:21 push forward with a US launch this year," colon.		
311:23 - 311:25	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:10	PR_v11p_As-Play edinCourt120202 6.41
	311:23 well, let me back up. In 2020, Uber was exploring		
	311:24 this idea of launching a pilot in four U.S. cities		
	311:25 for the Women Rider Preferred product, right?		
312:02 - 312:09	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:16	PR_v11p_As-Play edinCourt120202 6.42
	312:02 THE WITNESS: I think it was under		
	312:03 discussion.		
	312:04 BY MR. ABRAMSON:		
	312:05 Q. Sure. And the option that Uber was		

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DESIGNATION	SOURCE	DURATION	ID
	312:06 exploring at this time in 2020 was a driver side		
	312:07 option where women drivers would be provided with		
	312:08 the option to prefer for Uber to match them with a		
	312:09 woman passenger, right?		
312:11 - 312:11	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:02	PR_v11p_As-Play edinCourt120202 6.43
	312:11 THE WITNESS: Yes.		
312:18 - 312:22	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:17	PR_v11p_As-Play edinCourt120202 6.44
	312:18 THE WITNESS: I think with general -- you		
	312:19 know, the marketplace challenges that we've		
	312:20 discussed, it seemed more viable as a product to		
	312:21 introduce a driver-side version. So that's what's		
	312:22 under discussion in this particular document.		
312:24 - 313:03	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:12	PR_v11p_As-Play edinCourt120202 6.45
	312:24 Q. And in 2020, you and other members from		
	312:25 this kind of cross-functional Uber team supported		
	313:01 moving forward with piloting the Women Rider		
	313:02 Preferred product in the U.S., right?		
	313:03 A. Yes.		
313:04 - 313:07	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:09	PR_v11p_As-Play edinCourt120202 6.46
	313:04 Q. And part of that was you had concerns --		
	313:05 your team had concerns that Lyft, Uber's biggest		
	313:06 U.S. competitor, may launch the product before Uber,		
	313:07 right?		
313:09 - 313:16	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:21	PR_v11p_As-Play edinCourt120202 6.47
	313:09 THE WITNESS: I think that was one of the		
	313:10 inputs, but certainly our basis of launching kind of		
	313:11 goes beyond that, and, you know, we were hoping to		
	313:12 introduce this as a way to improve safety on the		
	313:13 platform.		
	313:14 BY MR. ABRAMSON:		
	313:15 Q. And you or your team, did you meet with		
	313:16 Mr. Fuldner about this option in 2020?		
313:18 - 313:21	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:13	PR_v11p_As-Play edinCourt120202
	313:18 THE WITNESS: I think as it relates to the		

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DESIGNATION	SOURCE	DURATION	ID
	313:19 Stand for Safety meeting that happened on 6/26, yes, 313:20 Gus would have been in that meeting where it would 313:21 be discussed.		
313:23 - 314:01	Payne, Rebecca 2025-04-02 - PIP MP4 313:23 Q. Okay. Now, in addition to Gus, are you 313:24 aware of what Jill Hazelbaker's position was on 313:25 whether or not Uber should move forward with a pilot 314:01 of the Women Rider Preferred option in 2020?	00:00:21	PR_v11p_As-Play edinCourt120202 6.49
314:03 - 314:06	Payne, Rebecca 2025-04-02 - PIP MP4 314:03 THE WITNESS: Not off the top of my head. 314:04 I think Andrew and Kayla, I believe, reported up 314:05 through Jill Hazelbaker, so some of their comms 314:06 inputs are here.	00:00:12	PR_v11p_As-Play edinCourt120202 6.50
315:12 - 317:22	Payne, Rebecca 2025-04-02 - PIP MP4 315:12 Q. Okay. And Ms. Hazelbaker at that time, 315:13 she was a member of the executive leadership team, 315:14 right? 315:15 A. Yes. 315:16 Q. So let's look at what Mr. Hasbun has to 315:17 say. "Hey Sachin. Please do not forward - just 315:18 want you to be aware." You see that? 315:19 A. Yes. 315:20 Q. "We had our Safety Comms/Policy/Marketing 315:21 plan reviews with Jill yesterday." Do you see that? 315:22 A. Yes. 315:23 Q. And you understand that's Jill Hazelbaker, 315:24 right? 315:25 A. Yes. 316:01 Q. "She gave us some very clear thoughts and 316:02 guidance on Women Rider Preferred that I want to 316:03 share with you directly. I've cc'd Jodi since she 316:04 was on the call and will be leading the event where 316:05 this feature is announced." Do you see that? 316:06 A. Yes. 316:07 Q. Can you read for the jury what Jill 316:08 Hazelbaker's thought under 1 is? 316:09 A. "Jill thinks this feature is," in quotes,	00:02:16	PR_v11p_As-Play edinCourt120202 6.51

DESIGNATION	SOURCE	DURATION	ID
	316:10 'transformative.'		
	316:11 Q. Can you please read to the jury No. 2.		
	316:12 A. In regards to data, she feels there are		
	316:13 moments when we can't rely solely on what the data		
	316:14 does or does not tell us. We have to trust our," in		
	316:15 quotes, "'gut.' Her gut," in parentheses, "(and		
	316:16 mine and everyone else's in comms and marketing)		
	316:17 tells her that this feature is the right thing to do		
	316:18 for many reasons including bringing women back onto		
	316:19 the platform."		
	316:20 Q. And then, "She questioned the timing of		
	316:21 the announcement...supportive of September but wants		
	316:22 COVID to be our sole focus and we should be prepared		
	316:23 to shift the timing if COVID is still intense come		
	316:24 September." Do you see that?		
	316:25 A. Yes.		
	317:01 Q. And then she recommends under 4 that "She		
	317:02 feels we should eventually convene a small group,		
	317:03 including Dara" -- that's the CEO, right?		
	317:04 A. Yes.		
	317:05 Q. -- "to hash out some of the issues around		
	317:06 this feature and get everyone aligned," right?		
	317:07 A. Yes.		
	317:08 Q. No. 5, she says, "She does not support a		
	317:09 launch in Australia first and feels no English		
	317:10 speaking western country should go before the United		
	317:11 States," to which Mr. Hasbun said in parentheses, "I		
	317:12 agree." Do you see that?		
	317:13 A. Yes.		
	317:14 Q. And can you read that last -- or the next		
	317:15 paragraph to the jury, please?		
	317:16 A. "I wanted to tell you all this because it		
	317:17 feels like support from the players involved in this		
	317:18 process changes like wind and we are not		
	317:19 progressing. We should be beyond debating the		
	317:20 merits of the feature and working to build a		
	317:21 blockbuster launch in the US and other countries."		
	317:22 Q. And that did not happen in 2020, correct?		
317:24 - 317:24	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:01	PR_v11p_As-Play
	317:24 THE WITNESS: It did not.		edinCourt120202

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DESIGNATION	SOURCE	DURATION	ID
319:12 - 319:15	Payne, Rebecca 2025-04-02 - WIT MP4 319:12 THE WITNESS: I think the discussions were 319:13 still ongoing, so I don't know that a final decision 319:14 was made at that point, but the product was not 319:15 launched in 2020.	00:00:11	PR_v11p_As-Play edinCourt120202 6.53
319:17 - 319:18	Payne, Rebecca 2025-04-02 - WIT MP4 319:17 Q. Right. So as of 2020, no women-matching 319:18 option was launched in the United States, correct?	00:00:07	PR_v11p_As-Play edinCourt120202 6.54
319:20 - 319:20	Payne, Rebecca 2025-04-02 - WIT MP4 319:20 THE WITNESS: Correct.	00:00:01	PR_v11p_As-Play edinCourt120202 6.55
319:22 - 319:25	Payne, Rebecca 2025-04-02 - WIT MP4 319:22 Q. And as of 2020, no pilot had even been 319:23 started in the U.S. for a women-matching option, 319:24 correct? 319:25 A. Correct.	00:00:11	PR_v11p_As-Play edinCourt120202 6.56
324:19 - 324:22	Payne, Rebecca 2025-04-02 - PIP MP4 324:19 Q. And under "Project Updates," can you read 324:20 that first bullet point, please? 324:21 A. "WRP has significantly reduced female 324:22 driver's SA/SM and IPC incident rates."	00:00:11	PR_v11p_As-Play edinCourt120202 6.57
326:20 - 326:24	Payne, Rebecca 2025-04-02 - PIP MP4 326:20 Q. "The issues with this is a reduction is 326:21 based on less than 100 incidents (guessing from the 326:22 driver count) and likely to be volatile/not 326:23 reproducible," right? 326:24 A. Yes.	00:00:10	PR_v11p_As-Play edinCourt120202 6.58
339:14 - 339:23	Payne, Rebecca 2025-04-02 - PIP MP4 339:14 Q. And in 2021, your team was again 339:15 resurfacing this idea of a launch of the 339:16 women-matching option in the United States, right? 339:17 A. I think we were, yes, considering 339:18 expansion and potential launch in the United States.	00:00:32	PR_v11p_As-Play edinCourt120202 6.59

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DESIGNATION	SOURCE	DURATION	ID
	339:19 Q. And the option that was being considered		
	339:20 at that time in 2021 that Uber chose to explore was		
	339:21 a driver-side option, where women drivers would be		
	339:22 provided the option to prefer for Uber to match them		
	339:23 with a woman passenger, right?		
339:25 - 339:25	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:01	PR_v11p_As-Play edinCourt120202 6.60
	339:25 THE WITNESS: Yes.		
341:15 - 341:17	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:11	PR_v11p_As-Play edinCourt120202 6.61
	341:15 Q. So here we are, this is an e-mail on		
	341:16 April 2nd, 2021. Do you see that?		
	341:17 A. Yes.		
341:18 - 342:09	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:40	PR_v11p_As-Play edinCourt120202 6.62
	341:18 Q. And it's from Ms. Pimentel to Uber's CEO,		
	341:19 right?		
	341:20 A. Yes.		
	341:21 Q. And it says, "We need to discuss Women		
	341:22 Rider Preferred in the US. It is a controversial		
	341:23 topic and ultimately an ELT-level decision. Gus,		
	341:24 Sachin, and team are ready and I'm working on		
	341:25 getting all the pre-briefs done with various folks		
	342:01 to make it productive," right?		
	342:02 A. Yes.		
	342:03 Q. And the agenda at 11:30, you, among		
	342:04 others, are going to be, looks like, presenting to		
	342:05 the ELT on a Women Rider Preferred discussion,		
	342:06 right?		
	342:07 A. Yes.		
	342:08 Q. So this is a decision that's being taken		
	342:09 to the top, right?		
342:11 - 342:11	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:02	PR_v11p_As-Play edinCourt120202 6.63
	342:11 THE WITNESS: Yes. I think it was a very (edited)		
342:12 - 342:15	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:13	PR_v11p_As-Play edinCourt120202 6.64
	342:12 in-depth, you know, all of these years of kind of		
	342:13 work and discussion on the project, and, you know,		
	342:14 continued drive to want to launch it in the U.S. as		

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DESIGNATION	SOURCE	DURATION	ID
	342:15 well.		
342:17 - 342:20	Payne, Rebecca 2025-04-02 - PIP MP4 342:17 Q. Now, as we saw before internally at Uber, 342:18 there are -- there were many proponents of moving 342:19 forward with a women-matching option in the United 342:20 States, right?	00:00:09	PR_v11p_As-Play edinCourt120202 6.65
342:22 - 342:23	Payne, Rebecca 2025-04-02 - PIP MP4 342:22 THE WITNESS: Yes, and I was certainly one 342:23 of them.	00:00:02	PR_v11p_As-Play edinCourt120202 6.66
342:25 - 343:03	Payne, Rebecca 2025-04-02 - PIP MP4 342:25 Q. Right. That included you, right? But the 343:01 legal folks at Uber was -- were claiming there was a 343:02 significant legal risk associated with a 343:03 female-matching option, right?	00:00:09	PR_v11p_As-Play edinCourt120202 6.67
343:08 - 343:12	Payne, Rebecca 2025-04-02 - PIP MP4 343:08 A. The legal team provided inputs, but that 343:09 was discussions with counsel. 343:10 Q. All right. Let's look at what some of 343:11 Uber's employees were saying leading up to this 343:12 executive leadership team meeting in 2021.	00:00:10	PR_v11p_As-Play edinCourt120202 6.68
343:21 - 344:06	Payne, Rebecca 2025-04-02 - PIP MP4 343:21 Q. Okay. So this is a series of Slack 343:22 messages, right? 343:23 A. That's what it appears to be, yes. 343:24 Q. Between Jodi Page, Andrew Hasbun, and 343:25 Brittany Anthony, right? 344:01 A. Yes. 344:02 Q. And Andrew Hasbun and Brittany Anthony, 344:03 those are two -- those are the only two people who 344:04 were presenting along with you at the March 1st, 344:05 2021 Stand for Safety ELT meeting, right? 344:06 A. Yes.	00:00:26	PR_v11p_As-Play edinCourt120202 6.69
344:10 - 344:21	Payne, Rebecca 2025-04-02 - PIP MP4 344:10 Q. So let's look at what they were saying	00:00:33	PR_v11p_As-Play edinCourt120202

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DESIGNATION	SOURCE	DURATION	ID
	344:11 internally. Mr. Hasbun starts, "I am raging again.		
	344:12 We are OK with SRAD which literally labels someone		
	344:13 higher risk because their phone is not fully charged		
	344:14 but no OK with WRP? The insanity must stop." Do		
	344:15 you see that?		
	344:16 A. I do.		
	344:17 Q. And then after Brittany Anthony has a		
	344:18 couple comments, Ms. Page says, "What congressman		
	344:19 would not want their daughter to use this feature if		
	344:20 she was planning to drive for Uber," right?		
	344:21 A. That's what it says.		
345:14 - 345:16	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:07	PR_v11p_As-Play edinCourt120202 6.71
	345:14 Q. Down below, Ms. Page says, "How can we		
	345:15 dismiss legal realities if we don't know what they		
	345:16 are?"		
345:20 - 345:21	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:02	PR_v11p_As-Play edinCourt120202 6.72
	345:20 Do you see that? (edited)		
	345:21 A. Yes.		
347:21 - 348:12	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:35	PR_v11p_As-Play edinCourt120202 6.73
	347:21 Q. Okay. So we are still on March 1st, 2021,		
	347:22 right?		
	347:23 A. Yes.		
	347:24 Q. And that's the same day as we saw in that		
	347:25 Stand for Safety executive leadership team committee		
	348:01 meeting, right?		
	348:02 A. Yes.		
	348:03 Q. And this is another Slack message, right?		
	348:04 A. That's what it appears to be, yes.		
	348:05 Q. And the participants are Brooke Anderson,		
	348:06 Andrew Hasbun, Jodi Page, and Brittany Anthony,		
	348:07 right?		
	348:08 A. Yes.		
	348:09 Q. And all four of those people were involved		
	348:10 in the Women Rider Preferred matching presentations		
	348:11 at that time, right?		
	348:12 A. Yes, in that presentation.		
348:13 - 348:14	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:03	PR_v11p_As-Play

DESIGNATION	SOURCE	DURATION	ID
	348:13 Q. Okay. Along with you and others, correct?		edinCourt120202 6.74
	348:14 A. Correct.		
348:15 - 349:12	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:57	PR_v11p_As-Play edinCourt120202 6.75
	348:15 Q. All right. Let's see what they were		
	348:16 saying. Jodi says here in the middle, "It's opt-in,		
	348:17 pilot and vast majority of sexual assaults are		
	348:18 perpetrated by men. It's common sense." Do you see		
	348:19 that?		
	348:20 A. I see it.		
	348:21 Q. And she's referring to the potential		
	348:22 opt-in pilot of Women Rider Preferred in the U.S.,		
	348:23 correct?		
	348:24 A. Yes.		
	348:25 Q. Down here it says, "It's all just		
	349:01 paranoia. I really don't like the 'what are we		
	349:02 going to say if' debate. The lack of trust and		
	349:03 confidence is insulting." Do you see that?		
	349:04 A. I do.		
	349:05 Q. Mr. Hasbun says, "How many time do we have		
	349:06 to go down this road. The goalposts just keep		
	349:07 moving. Always an excuse." Right?		
	349:08 A. I see that, yes.		
	349:09 Q. And is that a sentiment that Mr. Hasbun		
	349:10 expressed to you as part of your work with him on		
	349:11 this product?		
	349:12 A. Yes.		
349:15 - 350:01	Payne, Rebecca 2025-04-02 - PIP MP4	00:00:28	PR_v11p_As-Play edinCourt120202 6.76
	349:15 Q. Ms. Anderson says, "That's the easy part,		
	349:16 throwing those responses in a doc. We need to be		
	349:17 like a dog with a bone on a legal risk; what is it		
	349:18 exactly?"		
	349:19 And then Mr. Hasbun says, "How about		
	349:20 lawyers just focus their area."		
	349:21 Jodi Page says, "Like getting sued by		
	349:22 who?"		
	349:23 So at this time, was there a lack of		
	349:24 understanding as to who was actually going to sue		

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DESIGNATION	SOURCE	DURATION	ID
	349:25 Uber with respect to this Women Riding -- Women 350:01 Rider Preferred option?		
350:03 - 350:06	Payne, Rebecca 2025-04-02 - PIP MP4 350:03 THE WITNESS: I think what you're seeing 350:04 reflected in this message is, yes, some confusion 350:05 because of discussions that were happening in that 350:06 meeting.	00:00:09	PR_v11p_As-Play edinCourt120202 6.77
350:07 - 350:12	Payne, Rebecca 2025-04-02 - PIP MP4 350:07 BY MR. ABRAMSON: 350:08 Q. Okay. So Andrew Hasbun says, "AOC" -- 350:09 that's Ms. Cortez -- "Biden, Justice? Never gonna 350:10 happen. Republics? Bring it on." That's what he 350:11 says, right? 350:12 A. That's what he says.	00:00:14	PR_v11p_As-Play edinCourt120202 6.78
350:15 - 350:18	Payne, Rebecca 2025-04-02 - PIP MP4 350:15 Q. All right. And then if we go to the next 350:16 page, Jodi Page says, "Still trying to figure out 350:17 what that risk actually is," right? 350:18 A. Yes.	00:00:11	PR_v11p_As-Play edinCourt120202 6.79
351:06 - 351:08	Payne, Rebecca 2025-04-02 - PIP MP4 351:06 Q. Okay. If we go down to the next page, can 351:07 you read what I have highlighted there that Ms. Page 351:08 said on March 2nd?	00:00:08	PR_v11p_As-Play edinCourt120202 6.80
351:09 - 351:15	Payne, Rebecca 2025-04-02 - PIP MP4 351:09 A. "Yes and when do we ever have a product 351:10 that improves safety, potentially helps supply and 351:11 is good for the biz?" 351:12 Q. Mr. Hasbun says what? 351:13 A. "Never." 351:14 Q. Ms. Page says what? 351:15 A. "Usually those things are at odds."	00:00:12	PR_v11p_As-Play edinCourt120202 6.81
351:22 - 352:14	Payne, Rebecca 2025-04-02 - PIP MP4 351:22 Ms. Anderson says, "Don't want legal to slow our	00:00:42	PR_v11p_As-Play edinCourt120202 6.82

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DESIGNATION	SOURCE	DURATION	ID
	351:23 roll, we can def make this happen. This is		
	351:24 happening." Right?		
	351:25 A. Brooke said that, and then Jodi said,		
	352:01 "This is happening."		
	352:02 Q. And Ms. Page says, "Make the platform		
	352:03 safer for women, make it safer for everyone. Word."		
	352:04 Right?		
	352:05 A. That's what she said.		
	352:06 Q. If we go to the next page, she says, "This		
	352:07 is something that makes sense to everyday people,"		
	352:08 right?		
	352:09 A. Yes.		
	352:10 Q. Ms. Anderson says, "Very excited for this		
	352:11 one let's bring it home."		
	352:12 And Ms. Page says, "Regardless of what if		
	352:13 lawsuits and debates," right?		
	352:14 A. That's what she said.		
409:18 - 409:24	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:17	PR_v11p_As-Play edinCourt120202 6.83
	409:18 Q. Okay. We have this presentation, and if		
	409:19 you look at the title page, it says, "Women Rider		
	409:20 Preference & US Path Forward Decision." Do you see		
	409:21 that?		
	409:22 A. Yes.		
	409:23 Q. And "April 2021," right?		
	409:24 A. Yes.		
410:18 - 410:21	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:10	PR_v11p_As-Play edinCourt120202 6.84
	410:18 Q. Okay. So this is being presented to a		
	410:19 portion of the executive leadership team, which		
	410:20 included the CEO, correct?		
	410:21 A. Yes.		
410:22 - 410:23	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:06	PR_v11p_As-Play edinCourt120202 6.85
	410:22 Q. All right. And if we turn to the next		
	410:23 page, there are "2 Options for Discussion Today,"		
411:04 - 411:07	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:09	PR_v11p_As-Play edinCourt120202 6.86
	411:04 Q. Okay. So those are our two options. And		
	411:05 are you part of the team presenting to the executive		

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DESIGNATION	SOURCE	DURATION	ID
	411:06 leadership team on April 6, 2021?		
	411:07 A. Yes.		
411:13 - 411:18	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:22	PR_v11p_As-Play edinCourt120202 6.87
	411:13 .0004, please. We again see in this presentation (edited)		
	411:14 that, now being told to the Uber executive		
	411:15 leadership team, including the CEO, that women rider		
	411:16 trips with WRP on versus off, at least in this		
	411:17 dataset, incidents of sexual assault and sexual		
	411:18 misconduct were significantly reduced; fair?		
411:20 - 411:22	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:06	PR_v11p_As-Play edinCourt120202 6.88
	411:20 THE WITNESS: Yes, with the same asterisk		
	411:21 that we've discussed about it being directionally		
	411:22 strong, but magnitude being unclear.		
412:03 - 412:11	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:19	PR_v11p_As-Play edinCourt120202 6.89
	412:03 Q. And it looks like these are pros and cons.		
	412:04 Do you see that?		
	412:05 A. I do.		
	412:06 Q. And can you read the first pro to the		
	412:07 jury?		
	412:08 A. "The safety benefit for drivers: Our		
	412:09 Safety Report called attention to the need to		
	412:10 improve driver safety and this product has shown a		
	412:11 positive safety impact for women drivers."		
412:21 - 412:24	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:10	PR_v11p_As-Play edinCourt120202 6.90
	412:21 -- by "positive safety impact," you're (edited)		
	412:22 referring to the ability for the Women Rider		
	412:23 Preferred product to reduce incidents of sexual		
	412:24 assault and sexual misconduct, correct?		
413:01 - 413:02	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:02	PR_v11p_As-Play edinCourt120202 6.91
	413:01 THE WITNESS: Yes.		
	413:02 BY MR. ABRAMSON:		
413:03 - 413:10	Payne, Rebecca 2025-04-03 - WIT MP4	00:00:19	PR_v11p_As-Play edinCourt120202 6.92
	413:03 Q. Okay. And if we go down below, under the		

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DESIGNATION	SOURCE	DURATION	ID
	413:04 notes, do you see there's a section that says --		
	413:05 starts with "Safety benefits"?		
	413:06 A. Yes.		
	413:07 Q. And can you read that first line under		
	413:08 "Safety benefits"?		
	413:09 A. "When you make the platform safer for		
	413:10 women, you make it safer for everyone."		
429:22 - 430:02	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:13	PR_v11p_As-Play edinCourt120202 6.93
	429:22 Q. Okay. So this is an e-mail on April 6th		
	429:23 at 9:22 p.m., and the subject is "WRP" -- that's		
	429:24 "Women Rider Preferred," right?		
	429:25 A. Yes.		
	430:01 Q. -- "US decision," right?		
	430:02 A. Yes.		
430:03 - 430:04	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:05	PR_v11p_As-Play edinCourt120202 6.94
	430:03 Q. And that decision was being made by Uber's		
	430:04 executive leadership team, correct?		
430:06 - 430:07	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:04	PR_v11p_As-Play edinCourt120202 6.95
	430:06 THE WITNESS: Yes, with all of the input		
	430:07 and nuance and all of the other teams on the call.		
430:09 - 430:13	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:09	PR_v11p_As-Play edinCourt120202 6.96
	430:09 Q. But the final decision of (edited)		
	430:10 whether to move forward or not, with all the		
	430:11 information gathered from all the teams, that was a		
	430:12 decision being made by Uber's executive leadership		
	430:13 team, right?		
430:15 - 430:16	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:02	PR_v11p_As-Play edinCourt120202 6.97
	430:15 THE WITNESS: Yes, with all of those		
	430:16 inputs included.		
430:21 - 431:07	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:32	PR_v11p_As-Play edinCourt120202 6.98
	430:21 Q. Let's just read the first paragraph, if		
	430:22 you don't mind.		
	430:23 A. "Wanted to give you an update after the		

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DESIGNATION	SOURCE	DURATION	ID
	430:24 ELT review of WRP today. Ultimately the decision is		
	430:25 to not launch WRP in the U.S. (at least for now) and		
	431:01 to move forward with launching in Australia and our		
	431:02 other planned markets. I don't think anyone will be		
	431:03 surprised by the decision, it's just unfortunate how		
	431:04 the legal system works in the US and that even if we		
	431:05 know the product we are launching is a worthy cause,		
	431:06 it doesn't change the potential legal costs and the		
	431:07 fact that Uber is a magnet for these issues."		
432:16 - 432:19	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:10	PR_v11p_As-Play edinCourt120202 6.99
	432:16 Q. And this program, Women Rider Preferred,		
	432:17 that would have been a program that was a worthy		
	432:18 cause and resulted in a reduction in sexual assault		
	432:19 and sexual misconduct incidents, right?		
432:22 - 433:03	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:18	PR_v11p_As-Play edinCourt120202 6.100
	432:22 THE WITNESS: I think it is a worthy		
	432:23 cause, as are all of the other safety features that		
	432:24 we work on. And we've looked at data of how it		
	432:25 performed in other markets, albeit in small volumes.		
	433:01 That's why, you know, this discussion was being had		
	433:02 and why the discussions continued to be had after		
	433:03 this.		
433:05 - 433:05	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:02	PR_v11p_As-Play edinCourt120202 6.101
	433:05 Q. But not launched, right?		
433:07 - 433:18	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:28	PR_v11p_As-Play edinCourt120202 6.102
	433:07 THE WITNESS: Not at this point, and		
	433:08 that's where you see the kind of, at least for now,		
	433:09 where we wanted to continue having these discussions		
	433:10 over time.		
	433:11 BY MR. ABRAMSON:		
	433:12 Q. Well, Ms. Payne, you keep on saying that,		
	433:13 "at least for now." We're in April 2025. It still		
	433:14 hasn't happened. So at least for 2025, in April,		
	433:15 right?		
	433:16 A. In April 2025, yes, but I believe that the		
	433:17 discussions are still ongoing, and the team is		

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DESIGNATION	SOURCE	DURATION	ID
	433:18 seriously considering it at this point.		
433:19 - 433:20	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:07	PR_v11p_As-Play edinCourt120202 6.103
	433:19 Q. Well, Ms. Payne, the team has been		
	433:20 seriously considering this option for years, right?		
433:22 - 434:11	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:43	PR_v11p_As-Play edinCourt120202 6.104
	433:22 THE WITNESS: Yes, and that's why I think		
	433:23 it shows the care that we're putting into this as		
	433:24 well, in terms of being able to launch it in other		
	433:25 markets and continuing to try. And, you know, as		
	434:01 decisions change as, you know, the environment		
	434:02 changes for these, we, you know, want to keep		
	434:03 pushing.		
	434:04 BY MR. ABRAMSON:		
	434:05 Q. Okay. It says, under that paragraph, "The		
	434:06 US isn't the end all be all, and now our job shifts		
	434:07 a bit - there are still many countries where WRP is		
	434:08 not available yet, and our goal is to launch in as		
	434:09 many of those countries as fast as possible and make		
	434:10 Uber safer for our users," right?		
	434:11 A. That's what it says.		
434:12 - 434:19	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:22	PR_v11p_As-Play edinCourt120202 6.105
	434:12 Q. Now, below that, in the bottom paragraph,		
	434:13 it says, "Overall, I wanted to thank this team for		
	434:14 the continued effort on this project - it's been		
	434:15 100% necessary to get the product where it is today		
	434:16 and I certainly couldn't have made as compelling of		
	434:17 a case for the US without all of your expertise and		
	434:18 passion (emphasis on the passion)." You see that?		
	434:19 A. I do.		
435:02 - 435:05	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:11	PR_v11p_As-Play edinCourt120202 6.106
	435:02 Q. Can you (edited)		
	435:03 explain to the jury what you, on behalf of -- you're		
	435:04 here on behalf of Uber -- what was explained by you		
	435:05 at this presentation that made a compelling case?		
435:21 - 435:24	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:12	PR_v11p_As-Play edinCourt120202

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DESIGNATION	SOURCE	DURATION	ID
	435:21 Q. Okay. But ultimately, the compelling case		6.107
	435:22 that you brought -- you and your colleagues brought		
	435:23 to the executive leadership team was turned down,		
	435:24 right?		
436:01 - 436:14	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:38	PR_v11p_As-Play edinCourt120202 6.108
	436:01 THE WITNESS: I think with all of the		
	436:02 inputs from, you know, the various folks, including		
	436:03 counsel, the decision at that point in time, again,		
	436:04 was not to move forward in the U.S. at that point,		
	436:05 and to continue expanding in other markets outside		
	436:06 the U.S.		
	436:07 BY MR. ABRAMSON:		
	436:08 Q. Okay. So at that time the idea was, we're		
	436:09 no doing anything in the U.S. with female matching,		
	436:10 but let's start expanding in Australia and other		
	436:11 countries outside of the United States, right?		
	436:12 A. That was, yes, the plan.		
	436:13 Q. Okay. So that's 2021. I want to move to		
	436:14 2022. Okay? (edited)		
437:15 - 437:18	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:14	PR_v11p_As-Play edinCourt120202 6.109
	437:15 Q. Okay. So this is an e-mail chain from		
	437:16 September of 2022, and it kind of goes through early		
	437:17 October 2022, correct?		
	437:18 A. Yes.		
437:24 - 439:01	Payne, Rebecca 2025-04-03 - PIP MP4	00:01:09	PR_v11p_As-Play edinCourt120202 6.110
	437:24 Q. And if we go to the last e-mail, there's		
	437:25 an e-mail directed to you on September 28th, 2022		
	438:01 from Cammie Jensen. Who is Cammie Jensen?		
	438:02 A. I didn't remember her before seeing this		
	438:03 e-mail, but the title at the bottom says "US &		
	438:04 Canada Central Operations - Driver Experience."		
	438:05 Q. Okay. And she writes to you and she says,		
	438:06 "Hi Rebecca, Women Rider Preference has been a		
	438:07 frequent topic of conversation among US&C Ops as we		
	438:08 discuss opportunities for driver growth and how to		
	438:09 meet the needs of underrepresented groups to drive		
	438:10 platform engagement." You see that?		

DESIGNATION	SOURCE	DURATION	ID
	438:11 A. Yes.		
	438:12 Q. And she says, "It would be great to		
	438:13 connect with you or the appropriate persons on your		
	438:14 team to understand the historic context, hear		
	438:15 Product's POV" -- that's "point of view," right?		
	438:16 A. Yes.		
	438:17 Q. -- "on the opportunity to expand in the		
	438:18 US, and understand high-level learnings from other		
	438:19 regions." Right?		
	438:20 A. Yes.		
	438:21 Q. And then you respond to her that same day,		
	438:22 right?		
	438:23 A. Yes.		
	438:24 Q. And can you read the e-mail that you wrote		
	438:25 to Ms. Jensen to the jury. Just the first bullet		
	439:01 point, if you would.		
439:09 - 439:20	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:31	PR_v11p_As-Play edinCourt120202 6.111
	439:09 A. "Hi Cammie - my favorite topic! As a		
	439:10 quick summary, I personally would love to launch WRP		
	439:11 globally - it's a product I'm super passionate about		
	439:12 and from the tech perspective this is a mature		
	439:13 product that is pretty easy for us to flip on in any		
	439:14 new markets (as we continue to do whenever we get		
	439:15 legal approval in a new market). We recently		
	439:16 launched our first western market: Australia. But		
	439:17 they have a government process in place for		
	439:18 requesting legal exemptions to anti-discrimination		
	439:19 laws, and they don't have a litigious culture quite		
	439:20 like the US."		
439:21 - 440:03	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:24	PR_v11p_As-Play edinCourt120202 6.112
	439:21 Q. So from an operations perspective, (edited)		
	439:22 from a product perspective, you're relaying the		
	439:23 message that, as of September 28, 2022, Women Rider		
	439:24 Preferred is easy for Uber to flip on in any new		
	439:25 markets, right?		
	440:01 A. I mean, it's a little more in depth than		
	440:02 flipping it on, but, you know, it had been launched		
	440:03 in other markets already.		

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DESIGNATION	SOURCE	DURATION	ID
440:04 - 440:05	Payne, Rebecca 2025-04-03 - PIP MP4 440:04 Q. So it could have been launched in the 440:05 U.S., from an operations perspective?	00:00:03	PR_v11p_As-Play edinCourt120202 6.113
440:07 - 440:08	Payne, Rebecca 2025-04-03 - PIP MP4 440:07 THE WITNESS: I would say from a technical 440:08 perspective.	00:00:02	PR_v11p_As-Play edinCourt120202 6.114
440:10 - 441:03	Payne, Rebecca 2025-04-03 - PIP MP4 440:10 Q. It could have been launched from a (edited) 440:11 technical perspective, correct? 440:12 A. Yes. 440:13 Q. Okay. If we go to the next bullet point, 440:14 can you read the sentence that starts with, 440:15 "Wherever we have launched," please. 440:16 A. "Wherever we have launched, we have not 440:17 seen any negative marketplace impacts, women" -- 440:18 "women drivers using the preference get the same 440:19 amount of trips as drivers not using the preference 440:20 (and a segment of women drivers who use the 440:21 preference the most end up driving more), and the 440:22 WRP trips have a lower safety incident rate than 440:23 non-WRP trips. In some countries, it is only used 440:24 by a small percentage of drivers, but in Brazil, for 440:25 example, where safety is a top concern and the 441:01 product has been live for a few years, 19% of all 441:02 women driver trips are done with WRP. Small summary 441:03 of BR," Brazil, "performance here."	00:00:53	PR_v11p_As-Play edinCourt120202 6.115
441:22 - 442:03	Payne, Rebecca 2025-04-03 - PIP MP4 441:22 Q. Okay. So wherever Uber has launched up to 441:23 that point, you're telling her that we have seen no 441:24 negative marketplace impacts, right? 441:25 A. Yes. 442:01 Q. That women drivers using the preference 442:02 get the same amount of trips of drivers not using 442:03 the preference, right?	00:00:17	PR_v11p_As-Play edinCourt120202 6.116
442:05 - 442:12	Payne, Rebecca 2025-04-03 - PIP MP4 442:05 THE WITNESS: That's what it says, yes.	00:00:13	PR_v11p_As-Play edinCourt120202

DESIGNATION	SOURCE	DURATION	ID
	442:06 BY MR. ABRAMSON:		
	442:07 Q. And then you say, "and the WRP trips have		
	442:08 a lower safety incident rate than non-WRP trips,"		
	442:09 right?		
	442:10 A. Yes.		
	442:11 Q. And you believed that when you wrote that,		
	442:12 didn't you?		
442:14 - 442:14	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:01	PR_v11p_As-Play edinCourt120202 6.118
	442:14 THE WITNESS: Yes.		
442:16 - 444:10	Payne, Rebecca 2025-04-03 - PIP MP4	00:01:34	PR_v11p_As-Play edinCourt120202 6.119
	442:16 Q. Okay. So if we move up this e-mail chain		
	442:17 to September 29th, 2022, where Mr. Hasbun is writing		
	442:18 back to you -- are you with me?		
	442:19 A. Yes.		
	442:20 Q. And he says, "I'll let Daniel chime in on		
	442:21 the legal details." And that's Daniel Kolta, who's		
	442:22 in legal, right?		
	442:23 A. Yes.		
	442:24 Q. Okay. "For additional context, the		
	442:25 conversations around this feature happened in		
	443:01 spring/summer 2021" -- and to stop right there, we		
	443:02 know that was in April of 2021, right?		
	443:03 A. Yes.		
	443:04 Q. -- "which was a very different time at		
	443:05 Uber - we were still in the middle of the pandemic,		
	443:06 business health was a serious concern, and we were		
	443:07 dealing with significant legal blowback from the		
	443:08 Eats lawsuits." You see that?		
	443:09 A. Yes.		
	443:10 Q. "When it came down to it, the business,"		
	443:11 and then in parentheses it says, "(Dara" -- and		
	443:12 that's the CEO, right?		
	443:13 A. Dara, yep.		
	443:14 Q. Dara. I'm sorry. Dara. That's the CEO,		
	443:15 right?		
	443:16 A. (Nods head.)		
	443:17 Q. Mac, that's Andrew Macdonald, a member of		
	443:18 the executive leadership team, correct?		

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	443:19 A. Yes.		
	443:20 Q. Tony, that's Tony West, the chief legal		
	443:21 officer, also a member of the executive leadership		
	443:22 team, right?		
	443:23 A. Yes.		
	443:24 Q. So "When it came down to it, the		
	443:25 business," with those executive leadership teams in		
	444:01 parentheses, et cetera, "didn't have much of an		
	444:02 appetite for risk at that time" -- "at the time."		
	444:03 Do you see that?		
	444:04 A. Yes.		
	444:05 Q. "Although some of the legal challenges		
	444:06 remain, we are in a very different position today		
	444:07 and, 1.5 years later, it is worth revisiting the		
	444:08 plan to pilot this feature in low risk cities/states		
	444:09 in the US," right?		
	444:10 A. Yes.		
449:04 - 449:05	Payne, Rebecca 2025-04-03 - WIT MP4	00:00:05	PR_v11p_As-Play edinCourt120202 6.120
	449:04 and now we are in December of 2022, right?		
	449:05 A. Yes.		
469:04 - 469:07	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:13	PR_v11p_As-Play edinCourt120202 6.121
	469:04 The decision was made yet (edited)		
	469:05 again in December 2022 by the executive leadership		
	469:06 team at Uber to not launch a female-matching product		
	469:07 in the United States, right?		
469:09 - 469:12	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:10	PR_v11p_As-Play edinCourt120202 6.122
	469:09 THE WITNESS: When we're looking at this		
	469:10 document, it's still, I think, previous to the		
	469:11 meeting, but we did not end up launching the product		
	469:12 in 2022, so yes.		
471:04 - 471:20	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:34	PR_v11p_As-Play edinCourt120202 6.123
	471:04 Q. You wrote this document, right?		
	471:05 A. Yes.		
	471:06 Q. And it's created on December 16th, 2022,		
	471:07 correct?		
	471:08 A. Yes.		

DESIGNATION	SOURCE	DURATION	ID
	471:09 Q. So this is leading up to the next		
	471:10 iteration of meeting with the ELT about launching		
	471:11 Women Rider Preferred in the U.S., right?		
	471:12 A. Yes.		
	471:13 Q. And the title of this document is "WRP" --		
	471:14 that's Women Rider Preferred, right?		
	471:15 A. Yes.		
	471:16 Q. "ELT," that's executive leadership team,		
	471:17 right?		
	471:18 A. Yes.		
	471:19 Q. "Meeting Notes," right?		
	471:20 A. Yes.		
481:07 - 482:21	Payne, Rebecca 2025-04-03 - PIP MP4	00:01:51	PR_v11p_As-Play edinCourt120202 6.124
	481:07 Q. We're going to finish with this (edited)		
	481:08 document, and I want, if you would -- because these		
	481:09 are your words, and they're powerful. So if you		
	481:10 could, it says, "In terms of my editorial as a		
	481:11 woman." Do you see that?		
	481:12 A. I do.		
	481:13 Q. And this is you writing, correct?		
	481:14 A. It is.		
	481:15 Q. Can you read that to the jury?		
	481:16 A. "In terms of my editorial as a woman...if		
	481:17 I put myself driving in a car late on a Saturday		
	481:18 night, I ultimately know that there isn't much Uber		
	481:19 can really do to protect me if a man gets into my		
	481:20 car and starts sexually harassing/assaulting me -		
	481:21 because we aren't physically there to help. Sure, I		
	481:22 can record the incident, but that doesn't		
	481:23 necessarily stop it from happening, and in some		
	481:24 cases we've seen attackers toss the driver's dash		
	481:25 cam or phone since it has evidence. Sure, I can		
	482:01 call ADT or the police, but we're relying on either		
	482:02 a conversation with the rider knocking some sense		
	482:03 into them, or the time it takes for the police to		
	482:04 arrive on the scene. And that's assuming I'm		
	482:05 actually able to call for help - which brings us to		
	482:06 wearables (like a bracelet or button on the steering		
	482:07 wheel to call for help) but I don't have a ton of		

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	482:08 confidence in those, especially when I don't get		
	482:09 feedback from these types of devices to know that		
	482:10 police are on their way. Sure, I can ask the rider		
	482:11 to leave my car, but we know that usually doesn't go		
	482:12 over well. Bringing a friend or a child could help,		
	482:13 definitely, but what's the likelihood I can		
	482:14 regularly bring someone with me, and would that be		
	482:15 past my kid's bedtime or put them in danger?		
	482:16 Personally, the only thing that would give me real		
	482:17 confidence in driving drunk riders late at night		
	482:18 would be knowing that I'm only going to be driving		
	482:19 women. Of course this won't solve all of my safety		
	482:20 issues, but I feel like I have a better chance of		
	482:21 defending myself against a woman."		
482:23 - 483:15	Payne, Rebecca 2025-04-03 - WIT MP4	00:00:34	PR_v11p_As-Play edinCourt120202 6.125
	482:23 MR. ABRAMSON: Okay. The last document I		
	482:24 want to look at is -- before we take a break, this		
	482:25 is 2551.		
	483:01 (Whereupon Exhibit 2551 was marked for		
	483:02 identification.)		
	483:03 MR. ABRAMSON: And Jacqui, are you okay		
	483:04 with her reviewing this?		
	483:05 MS. RUBIN: Yeah.		
	483:06 MR. ABRAMSON: Okay. So --		
	483:07 BY MR. ABRAMSON:		
	483:08 Q. And I'm just going to ask you about the		
	483:09 first page. Feel free to read.		
	483:10 A. Sorry.		
	483:11 Q. You're okay. Do you want to take a break?		
	483:12 A. Yeah.		
	483:13 MR. ABRAMSON: Let's take a break.		
	483:14 THE VIDEOGRAPHER: Going off the record at		
	483:15 1:31 p.m.		
484:22 - 484:24	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:06	PR_v11p_As-Play edinCourt120202 6.126
	484:22 Q. Okay. And it was created on		
	484:23 December 19th, 2022, correct?		
	484:24 A. Yes.		
485:09 - 485:13	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:22	PR_v11p_As-Play

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	485:09 Q. And if we go to the first page, we see		edinCourt120202 6.127
	485:10 that on Monday, December 19, 2022, the Uber		
	485:11 executive leadership team made a decision with		
	485:12 respect to the Women Rider Preferred product in the		
	485:13 U.S., right?		
485:15 - 485:16	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:05	PR_v11p_As-Play edinCourt120202 6.128
	485:15 THE WITNESS: I -- I believe that's what		
	485:16 the conclusion is stating from that meeting.		
485:25 - 486:12	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:38	PR_v11p_As-Play edinCourt120202 6.129
	485:25 Q. So, "Consider legal cost associated with		
	486:01 Women Rider Preferred as research and development to		
	486:02 acquire and maximize supply benefit from women		
	486:03 earners; meet back mid-February with a tighter view		
	486:04 on legal and policy risk, safety and supply benefit;		
	486:05 then reassess the go-forward decision." Do you see		
	486:06 that?		
	486:07 A. I do.		
	486:08 Q. So in December of 2022, the executive		
	486:09 leadership team at Uber was again provided with an		
	486:10 opportunity to move forward with a pilot of the		
	486:11 Women Rider Preferred program in the United States,		
	486:12 right?		
486:14 - 486:14	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:01	PR_v11p_As-Play edinCourt120202 6.130
	486:14 THE WITNESS: Yes.		
496:06 - 496:16	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:36	PR_v11p_As-Play edinCourt120202 6.131
	496:06 Q. So the document we're looking at (edited)		
	496:07 now is a e-mail chain from the account of Gus		
	496:08 Fuldner, right?		
	496:09 A. Yes.		
	496:10 Q. And it's dated March 15th, 2023, right?		
	496:11 A. Yes.		
	496:12 Q. And so this is a few months after the last		
	496:13 meeting that you and others at Uber had with the		
	496:14 executive leadership team about the Women Rider		
	496:15 Preferred option in the U.S., right?		

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	496:16 A. Yes.		
496:24 - 496:25	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:03	PR_v11p_As-Play edinCourt120202 6.132
	496:24 Q. You received this document, right?		
	496:25 A. I received this e-mail, yeah.		
497:01 - 497:10	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:31	PR_v11p_As-Play edinCourt120202 6.133
	497:01 Q. Yeah. It says, "All, Thank you for your		
	497:02 time, efforts, and patience over the past three		
	497:03 months. Camiel's decision on WRP for the US, along		
	497:04 with notes and a recap of Friday's WRP call, can be		
	497:05 found below and linked here. Please let me know if		
	497:06 there are any questions. Best, Jenna." Right?		
	497:07 A. Yes.		
	497:08 Q. So was this Camiel's decision at the time,		
	497:09 in March 2023, as to whether or not to launch Women		
	497:10 Rider Preferred in the U.S.?		
497:12 - 498:02	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:43	PR_v11p_As-Play edinCourt120202 6.134
	497:12 THE WITNESS: I think she -- I mean, yes,		
	497:13 she's making a decision here. I think she kind of		
	497:14 was in charge of the U.S. business at this time,		
	497:15 and -- but I think -- I can see then the e-mail from		
	497:16 her above, where she's kind of supportive of		
	497:17 launching this in the future. But there's other		
	497:18 factors to consider.		
	497:19 BY MR. ABRAMSON:		
	497:20 Q. Sure. Because above there, if we go back		
	497:21 up to the top -- the next e-mail, Ms. Irving is		
	497:22 sending this to members of the executive leadership		
	497:23 team, Andrew Macdonald, Gus Fuldner, Jill		
	497:24 Hazelbaker, and Tony West, right?		
	497:25 A. Yes.		
	498:01 Q. And they're all involved in this decision		
	498:02 as well, correct?		
498:04 - 498:06	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:06	PR_v11p_As-Play edinCourt120202 6.135
	498:04 THE WITNESS: Yes, I think lots of people		
	498:05 involved, and those are certainly some of the key		
	498:06 players.		

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498:14 - 498:22	Payne, Rebecca 2025-04-03 - PIP MP4 498:14 Q. Okay. Can you read the top part? 498:15 A. "Hold on proceeding with WRP in the US at 498:16 this time." 498:17 Q. Okay. So, again, in March of 2023, the 498:18 proposal to launch a female-matching product in the 498:19 U.S. is brought to Uber's executive leadership team 498:20 and others high up in the company, and again the 498:21 decision is made not to move forward with the 498:22 female-matching option in the United States, right?	00:00:31	PR_v11p_As-Play edinCourt120202 6.136
498:24 - 498:25	Payne, Rebecca 2025-04-03 - PIP MP4 498:24 THE WITNESS: I think the decision is to 498:25 hold on proceeding at that point in time.	00:00:05	PR_v11p_As-Play edinCourt120202 6.137
499:05 - 499:18	Payne, Rebecca 2025-04-03 - PIP MP4 499:05 Q. "Fully recognize and appreciate the public 499:06 relations impact Women Rider Preferred could have, 499:07 however the supply needed to clear the legal risk is 499:08 substantial; we haven't seen similar increases other 499:09 than at new city launches. While Women Rider 499:10 Preferred shows signal on adoption and improving 499:11 safety, at this point don't have confidence that the 499:12 exposure risk will be outweighed by the PR moment or 499:13 that WRP will add women to the platform in a manner 499:14 that is sticky/has staying power." Do you see that? 499:15 A. I do. 499:16 Q. What does she mean by "the exposure risk 499:17 will be outweighed by the PR moment"? What does 499:18 that mean?	00:00:42	PR_v11p_As-Play edinCourt120202 6.138
499:24 - 500:02	Payne, Rebecca 2025-04-03 - PIP MP4 499:24 THE WITNESS: My understanding is that the 499:25 exposure risk kind of points to the legal input that 500:01 was provided by counsel. 500:02 BY MR. ABRAMSON:	00:00:11	PR_v11p_As-Play edinCourt120202 6.139
500:03 - 500:11	Payne, Rebecca 2025-04-03 - PIP MP4 500:03 Q. So again here, though, Ms. Irving, (edited)	00:00:29	PR_v11p_As-Play edinCourt120202 6.140

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DESIGNATION	SOURCE	DURATION	ID
	500:04 in a message that's again communicated to executive		
	500:05 leadership team members, is acknowledging that Women		
	500:06 Rider Preferred shows signal on improving safety,		
	500:07 right?		
	500:08 A. Yes.		
	500:09 Q. And safety would include reducing		
	500:10 incidents of sexual assault and sexual misconduct on		
	500:11 Uber's platform, right?		
500:13 - 500:13	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:01	PR_v11p_As-Play edinCourt120202 6.141
	500:13 THE WITNESS: Yes.		
500:15 - 500:25	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:46	PR_v11p_As-Play edinCourt120202 6.142
	500:15 Q. Okay. So we can put that aside. So we're		
	500:16 in March of 2023, and we've seen in some of these		
	500:17 documents, Ms. Payne, that there was kind of a		
	500:18 concern that Uber had or at least expressed the		
	500:19 discussions about its primary competitor in the		
	500:20 U.S., Lyft, beating it to the punch, right?		
	500:21 A. That was, yes, one of the inputs.		
	500:22 Q. That's one of the inputs, right? Is Lyft		
	500:23 going to launch before us; are they going to launch		
	500:24 a female-matching product before we do, right?		
	500:25 A. Yeah, one of the points in the case.		
503:10 - 503:10	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:07	PR_v11p_As-Play edinCourt120202 6.143
	503:10 So we're in September of 2023 now. Okay? (edited)		
503:11 - 503:16	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:12	PR_v11p_As-Play edinCourt120202 6.144
	503:11 And we have this Slack message, and if we see here,		
	503:12 it's dated September 8, 2023. Do you see that?		
	503:13 A. Yes.		
	503:14 Q. And it's from the account of Brooke		
	503:15 Anderson. Do you see that?		
	503:16 A. Yes.		
503:25 - 504:10	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:35	PR_v11p_As-Play edinCourt120202 6.145
	503:25 Q. Okay. So let's look at what happens on		
	504:01 September 8th, 2023. Can you read that to the jury,		
	504:02 what I have highlighted?		

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DESIGNATION	SOURCE	DURATION	ID
	504:03 A. "Lyft's big news that they wanted to fly 504:04 their CEO out for a popsugar deskside is...women 504:05 DRIVER preferred." 504:06 Q. That's what Uber's been talking about, 504:07 right? 504:08 A. Technically. Slightly different product, 504:09 but similar, yes. 504:10 Q. Lyft beat you to the punch, right?		
504:12 - 504:13	Payne, Rebecca 2025-04-03 - PIP MP4 504:12 THE WITNESS: They launched this Woman 504:13 Driver Preferred product before we did, yes.	00:00:05	PR_v11p_As-Play edinCourt120202 6.146
504:15 - 504:17	Payne, Rebecca 2025-04-03 - PIP MP4 504:15 Q. Well, you said, "before we did." You 504:16 still haven't, right? 504:17 A. Correct.	00:00:05	PR_v11p_As-Play edinCourt120202 6.147
504:20 - 505:07	Payne, Rebecca 2025-04-03 - PIP MP4 504:20 Q. Okay. And Ms. Anderson says on the next 504:21 page, "I am really annoyed." Do you see that? 504:22 A. Yes. 504:23 Q. And then below there, she says, "We" -- 504:24 and she's talking about Uber, right? "We are slow 504:25 and anti-risk." Do you see that? 505:01 A. I see that. 505:02 Q. And then on the next page, Ms. Anderson 505:03 again, "It's pathetic to be a follower on something 505:04 bold and innovative that could bolster our 505:05 reputation." Do you see that? 505:06 A. I see it. 505:07 Q. Do you agree with that?	00:00:35	PR_v11p_As-Play edinCourt120202 6.148
505:09 - 505:14	Payne, Rebecca 2025-04-03 - PIP MP4 505:09 THE WITNESS: I think that you saw over 505:10 the years this team kind of driving forward with 505:11 this product and wanting to launch it, but there 505:12 being lots of nuanced opinions and inputs to it over 505:13 time. And yes, I think I would have liked to be 505:14 first here and -- you know, yes.	00:00:29	PR_v11p_As-Play edinCourt120202 6.149

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DESIGNATION	SOURCE	DURATION	ID
505:16 - 505:17	Payne, Rebecca 2025-04-03 - PIP MP4 505:16 Q. What you would have liked to be first, you 505:17 would have liked to have been ever, right?	00:00:04	PR_v11p_As-Play edinCourt120202 6.150
505:21 - 505:22	Payne, Rebecca 2025-04-03 - PIP MP4 505:21 THE WITNESS: Yes, I -- you know, I do -- 505:22 yes, yes. I'll stop it there.	00:00:07	PR_v11p_As-Play edinCourt120202 6.151
505:24 - 506:05	Payne, Rebecca 2025-04-03 - PIP MP4 505:24 Q. Okay. Ms. Anderson goes on, "Especially 505:25 when you're sitting in the idea for 3 years." And 506:01 we're in September 8, 2023, right? And she says, 506:02 "We've got to stop acting like a utility and be the 506:03 innovators we really are," exclamation point. 506:04 Right? 506:05 A. Yes.	00:00:21	PR_v11p_As-Play edinCourt120202 6.152
506:10 - 506:16	Payne, Rebecca 2025-04-03 - PIP MP4 506:10 "Was the decision not to move forward (edited) 506:11 purely financial?" Do you see that? 506:12 A. I do. 506:13 Q. And then what does Mr. Hasbun say? 506:14 A. "The alleged threat of lawsuits." 506:15 Q. And then what does he say after that? 506:16 A. "Fear."	00:00:18	PR_v11p_As-Play edinCourt120202 6.153
506:17 - 507:02	Payne, Rebecca 2025-04-03 - PIP MP4 506:17 Q. On the next day, Conor Ferguson -- who's 506:18 Conor Ferguson? 506:19 A. I believe he's also on the PR team. 506:20 Q. He says, "Hey hey - Camiel" -- and we're 506:21 talking about Camiel Irving, right? 506:22 A. Yes. 506:23 Q. And Camiel's the person who, in the last 506:24 document we saw in March of 2023, was part of the 506:25 decision-making team with respect to moving forward 507:01 at that time with a female-matching option in the 507:02 U.S., right?	00:00:27	PR_v11p_As-Play edinCourt120202 6.154
507:04 - 508:07	Payne, Rebecca 2025-04-03 - PIP MP4	00:01:23	PR_v11p_As-Play

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DESIGNATION	SOURCE	DURATION	ID
507:04 - 508:07	Payne, Rebecca 2025-04-03 - PIP MP4	00:01:23	edinCourt120202 6.155
507:04	THE WITNESS: Yes.		
507:05	BY MR. ABRAMSON:		
507:06	Q. She says, "Hey hey" -- or he says, "Hey		
507:07	hey - Camiel is stressing about this announcement.		
507:08	She asked if I could give her a call tomorrow."		
507:09	Right?		
507:10	A. Yes.		
507:11	Q. And then he finally connects with her on		
507:12	the next day, and he says, "Hi - just connected		
507:13	briefly with Camiel - some notes from our convo		
507:14	below: Camiel spoke with a few folks yesterday on		
507:15	the tech and legal side and they are going to		
507:16	re-evaluate women rider preferred. She doesn't		
507:17	think the answer right now is to launch. We should		
507:18	see if there is backlash. If we decide to launch		
507:19	women rider preferred, she thinks it's good that		
507:20	it's slightly different - allows us to keep drivers		
507:21	front and center. As for response, she thinks we		
507:22	should talk about our material safety innovation and		
507:23	how we have launched this product globally already		
507:24	and continue to explore here in the US. Also thinks		
507:25	part of our response should be going hard on the		
508:01	driver side, reminding them of all the things we do		
508:02	to help keep them safe." Right?		
508:03	A. Yes.		
508:04	Q. Now, other than Lyft launching its		
508:05	female-matching option in September of 2023, had		
508:06	anything else changed in these variable input		
508:07	discussion points, that you're aware of?		
508:09 - 508:09	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:03	PR_v11p_As-Play edinCourt120202 6.156
508:09	THE WITNESS: Not that I'm aware of.		
513:03 - 513:05	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:10	PR_v11p_As-Play edinCourt120202 6.157
513:03	Q. And you would agree, Lyft launching a		
513:04	female-matching product in the United States is a		
513:05	big deal, right?		
513:07 - 513:18	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:38	PR_v11p_As-Play edinCourt120202
513:07	THE WITNESS: I think given all of the due		

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DESIGNATION	SOURCE	DURATION	ID
	513:08 diligence we had done on our own and the challenges		
	513:09 that we had seen, like, yes, it was, I think,		
	513:10 surprising and a big deal for Lyft to launch.		
	513:11 BY MR. ABRAMSON:		
	513:12 Q. "From a user perspective, I think this is		
	513:13 a huge value add (from a women safety perspective)		
	513:14 and they would definitely get uptake on this." What		
	513:15 does that mean? What does "uptake" mean?		
	513:16 A. I believe, although might be putting words		
	513:17 into his mouth, that he's referring to like usage of		
	513:18 the product.		
513:19 - 513:23	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:12	PR_v11p_As-Play edinCourt120202 6.159
	513:19 Q. Okay. And it says, "Even if this means		
	513:20 there is a longer wait or if it's Reserve only (or		
	513:21 Reserve led), it would still be a big value add,"		
	513:22 right? Now -- do you see that?		
	513:23 A. Yes.		
513:24 - 514:04	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:18	PR_v11p_As-Play edinCourt120202 6.160
	513:24 Q. Now, where he says, "Even if this means		
	513:25 there's a longer wait," there was a possibility that		
	514:01 because of the supply, or lack thereof at times, of		
	514:02 women drivers, that there may be a longer wait time		
	514:03 in order to get a ride, with a female-matching		
	514:04 option, right?		
514:06 - 514:12	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:19	PR_v11p_As-Play edinCourt120202 6.161
	514:06 THE WITNESS: That was, yes, the		
	514:07 assumption, and, you know, there's other kind of		
	514:08 follow-on effects of that, of how does that impact		
	514:09 women driver earnings if they're having to drive		
	514:10 from further away, or is the woman rider having to		
	514:11 pay more for that woman driver's time. So yes, that		
	514:12 was a concern.		
517:07 - 517:10	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:08	PR_v11p_As-Play edinCourt120202 6.162
	517:07 Q. Says, "The % of women earners in the US		
	517:08 definitely makes it a viable option." Do you see		
	517:09 that?		

DESIGNATION	SOURCE	DURATION	ID
	517:10 A. Yes.		
517:11 - 517:14	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:12	PR_v11p_As-Play edinCourt120202 6.163
	517:11 Q. So you agree that, again, as of this time,		
	517:12 September 10, 2023, given the percentage of women		
	517:13 earners in the United States, a female-matching		
	517:14 option was definitely a viable option, right?		
517:16 - 517:22	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:17	PR_v11p_As-Play edinCourt120202 6.164
	517:16 THE WITNESS: I think we've kind of seen		
	517:17 this terminology in other documents, of it being		
	517:18 viable. I've kind of questioned the reliability of		
	517:19 something like this, but, you know, I think viable		
	517:20 compared to other markets that we operate in, where		
	517:21 women drivers are in the single digits of		
	517:22 percentages.		
518:23 - 518:25	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:09	PR_v11p_As-Play edinCourt120202 6.165
	518:23 Q. The head of Safety Product is saying that		
	518:24 the percentage of women earners in the U.S.		
	518:25 definitely makes it a viable option, right?		
519:01 - 519:01	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:04	PR_v11p_As-Play edinCourt120202 6.166
	519:01 A. He's saying it's a viable option. I'm		
519:02 - 519:05	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:08	PR_v11p_As-Play edinCourt120202 6.167
	519:02 adding the commentary that "viable" is different		
	519:03 than "reliable." And, you know, obviously, he		
	519:04 didn't make that here, but I'm making that		
	519:05 distinction.		
521:04 - 521:14	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:29	PR_v11p_As-Play edinCourt120202 6.168
	521:04 BY MR. ABRAMSON:		
	521:05 Q. And then can you read for the jury what		
	521:06 Mr. Hasbun says here in this next paragraph, please?		
	521:07 A. "I don't think using a legal argument as		
	521:08 cover for us not doing a women rider" -- "picking		
	521:09 women driver feature will be a strong response given		
	521:10 the amount of companies who are willing to take the		

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DESIGNATION	SOURCE	DURATION	ID
	521:11 risk, possibly including Lyft now. And saying that		
	521:12 supply issues would make for a bad rider experience		
	521:13 could imply that Lyft is doing better at keeping		
	521:14 women drivers on their platform."		
526:07 - 526:12	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:16	PR_v11p_As-Play edinCourt120202 6.169
	526:07 Q. So this is a Slack message a couple (edited)		
	526:08 weeks after the Lyft announcement. I know it says		
	526:09 "Date Created: June 9th, 2024," but if we look at		
	526:10 the start date on the next page, you see it's		
	526:11 September 25th, 2023. You see that?		
	526:12 A. Yes.		
526:24 - 527:07	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:27	PR_v11p_As-Play edinCourt120202 6.170
	526:24 Q. Okay. So we have the director of safety		
	526:25 for US & Canada, and we have the lead on the Safety		
	527:01 Product Team, right?		
	527:02 A. Yes.		
	527:03 Q. And both of these people at this time, in		
	527:04 September 2023, are part of the group that's		
	527:05 involved in deciding what to do in response to Lyft		
	527:06 announcing this Women Rider Preference on its		
	527:07 platform, right?		
527:09 - 527:10	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:01	PR_v11p_As-Play edinCourt120202 6.171
	527:09 THE WITNESS: They're a part of the group,		
	527:10 yes.		
528:09 - 528:13	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:19	PR_v11p_As-Play edinCourt120202 6.172
	528:09 Q. So according to Mr. Brown in this Slack		
	528:10 message, Camiel Irving, who was part of the team		
	528:11 making a decision about what to do in response to		
	528:12 Lyft announcing a female-matching product, is not to		
	528:13 follow Lyft and announce its own product, right?		
528:15 - 528:24	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:37	PR_v11p_As-Play edinCourt120202 6.173
	528:15 THE WITNESS: I think this is probably		
	528:16 somewhat restating -- or not restating --		
	528:17 paraphrasing maybe Camiel's assessment on this, but		
	528:18 reading here, it says, "Her rec is to not launch,"		

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DESIGNATION	SOURCE	DURATION	ID
	528:19 though knowing from other documents where it's been 528:20 discussed and her opinion was more in her own words, 528:21 it was to not launch at this time and to continue 528:22 focusing on other U.S. women earner initiatives 528:23 while kind of continuing to look at all of the 528:24 inputs and make a decision for the future.		
529:13 - 529:18	Payne, Rebecca 2025-04-03 - PIP MP4 529:13 Q. Okay. Greg Brown on the next page says, 529:14 "I think it boils down to this not being a proven 529:15 supply lever, and even though Lyft made this move, 529:16 viewing them as a bellwether seems to be her 529:17 position." Do you see that? 529:18 A. I do.	00:00:13	PR_v11p_As-Play edinCourt120202 6.174
530:20 - 530:22	Payne, Rebecca 2025-04-03 - PIP MP4 530:20 Q. And he says, "I think policy and comms are 530:21 going to push back vehemently," right? 530:22 A. Yes.	00:00:06	PR_v11p_As-Play edinCourt120202 6.175
531:02 - 531:09	Payne, Rebecca 2025-04-03 - PIP MP4 531:02 Q. The head of U.S. Safety Operations says, 531:03 "I am a bit more neutral personally, but I would 531:04 obviously support proceeding from a safety 531:05 perspective," right? 531:06 A. Yes. 531:07 Q. And "safety perspective" means reducing 531:08 incidents of sexual assault and sexual misconduct on 531:09 Uber's platform, right?	00:00:18	PR_v11p_As-Play edinCourt120202 6.176
531:11 - 531:14	Payne, Rebecca 2025-04-03 - PIP MP4 531:11 THE WITNESS: That's a part of it. 531:12 Obviously, "safety" refers to all types of safety 531:13 incidents, but of which sexual assault and sexual 531:14 misconduct is a part.	00:00:07	PR_v11p_As-Play edinCourt120202 6.177
531:16 - 532:11	Payne, Rebecca 2025-04-03 - PIP MP4 531:16 Q. Well, let's see what Mr. Akamine 531:17 understood that. "Got it. OK makes sense. No 531:18 proven marketplace impact vs legal risk feels like a	00:00:58	PR_v11p_As-Play edinCourt120202 6.178

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	531:19 reasonable decision to make. I think it make		
	531:20 intuitive sense that higher percentage of women		
	531:21 rider trips should produce lower incident rate at		
	531:22 least for sexual assault/sexual misconduct," right?		
	531:23 That's what he says?		
	531:24 A. Yes.		
	531:25 Q. "But understand it's not just a safety		
	532:01 dimension." That's what he says, right?		
	532:02 A. Yes.		
	532:03 Q. And then can you read for the jury what		
	532:04 Mr. Brown, the head of U.S. Safety Operations, says		
	532:05 here at the end?		
	532:06 A. "Yeah for sure. I mean from my personal		
	532:07 perspective, giving women the tools to manage their		
	532:08 own risk seems like a positive thing to be adding to		
	532:09 the marketplace, but it doesn't come without		
	532:10 potential downside cost."		
	532:11 Q. And a potential downside cost is what?		
532:13 - 532:16	Payne, Rebecca 2025-04-03 - PIP MP4	00:00:11	PR_v11p_As-Play edinCourt120202 6.179
	532:13 THE WITNESS: I think there are inputs		
	532:14 from counsel as to the potential legal risk for this		
	532:15 product, so that was kind of one of the inputs		
	532:16 there.		
953:13 - 953:14	Payne, Rebecca 2025-05-13 - WIT MP4	00:00:05	PR_v11p_As-Play edinCourt120202 6.180
	953:13 I'm going to hand you a document that		
	953:14 we're going to mark as 2563 (edited)		
954:05 - 954:12	Payne, Rebecca 2025-05-13 - PIP MP4	00:00:20	PR_v11p_As-Play edinCourt120202 6.181
	954:05 Q. Okay. So we have a document here that is		
	954:06 created in April of 2024, modified in mid-October		
	954:07 2024.		
	954:08 Do you see that?		
	954:09 A. Yes.		
	954:10 Q. And the title of it is "Women Preferences		
	954:11 Product internal," right?		
	954:12 A. Yes.		
961:08 - 961:14	Payne, Rebecca 2025-05-13 - PIP MP4	00:00:24	PR_v11p_As-Play edinCourt120202
	961:08 Q. So, Ms. Payne, Uber knows that its		

DESIGNATION	SOURCE	DURATION	ID
	961:09 women-matching option significantly reduces sexual 961:10 assault and sexual misconduct incidents on Uber, 961:11 right? 961:12 A. For the Women Rider Preference offered to 961:13 drivers in -- in other countries, yes, the data has 961:14 shown a lower SA/SM and IPC rate.		
1054:03 - 1056:16	Payne, Rebecca 2025-05-13 - PIP MP4 1054:03 Q. Ms. Payne, can you tell us about your 1054:04 background and how you came to work at Uber. 1054:05 A. I graduated from the University of 1054:06 Southern California with a degree in business 1054:07 administration. After graduation, went to work for 1054:08 a company called Lookout Mobile Security for six 1054:09 years, did various marketing and product marketing 1054:10 roles for them. 1054:11 And then moved over to Uber where I was 1054:12 on the safety product team for five years and then 1054:13 moved into grocery deliver product. 1054:14 Q. And what did you do in your role as the 1054:15 product manager for safety features? 1054:16 A. As a product manager on the safety team (edited) 1054:17 was constantly looking at inputs, whether it's user 1054:18 feedback from riders or drivers, data, you know, 1054:19 support tickets that we receive, meeting with 1054:20 external experts on various safety topics in order 1054:21 to -- and then working with internal teams to -- to 1054:22 brainstorm what we could do to build features into 1054:23 the app that would help reduce safety incidents as 1054:24 well as get people help if they found themselves in 1054:25 an uncomfortable or unsafe situation. 1055:01 And then once we had those ideas and kind 1055:02 of prioritized them on a roadmap of features, we 1055:03 would work with designers, with engineering, with 1055:04 marketing, with operations, with support, all of 1055:05 these internal teams to make sure that we were 1055:06 building them in the right way that was 1055:07 understandable to, you know, riders and drivers 1055:08 and, you know, fit well into the app and that it 1055:09 was actually operational.	00:03:23	PR_v11p_As-Play edinCourt120202 6.183

DESIGNATION	SOURCE	DURATION	ID
	1055:10 Q. And you referred to this a little, but		
	1055:11 when you were the product manager for safety		
	1055:12 features, did you work with other teams to improve		
	1055:13 the safety of rides facilitated by the Uber app?		
	1055:14 A. Yeah, I think, you know, generally,		
	1055:15 the -- the safe team is board in terms of the --		
	1055:16 the functions that, you know, are formed within the		
	1055:17 safety team. So there's a safety product team that		
	1055:18 I was on as well as engineering, data science,		
	1055:19 marketing, operations, comms.		
	1055:20 And those operations teams are around the		
	1055:21 world and, you know, are based in all of the -- the		
	1055:22 regions that we operate and have an on-the-ground		
	1055:23 understanding of safety and regulatory and legal		
	1055:24 climates in those markets, as well as teams		
	1055:25 internal to Uber. So that can be the team that		
	1056:01 builds the earner app or the team that builds the		
	1056:02 rider app or the marketplace team that, you know,		
	1056:03 builds the technology that matches riders and		
	1056:04 drivers together.		
	1056:05 So a number of teams across the company		
	1056:06 in order to get these features to market.		
	1056:07 Q. And in your experience, does Uber devote		
	1056:08 significant employee resources to safe?		
	1056:09 A. Yes, I think we have hundreds of		
	1056:10 employees at the company working on safety on a		
	1056:11 daily basis, you know, a lot of teams that I		
	1056:12 mentioned in term of product and engineering and		
	1056:13 support and investigations, all focused on,		
	1056:14 you know, building the safety features but also		
	1056:15 kind of safety policies, safety messages outside of		
	1056:16 what, you know, the product team does.		

PLF Affirmative	00:52:42
DEF Counter	00:07:13
Overlaps	00:00:15
TOTAL RUN TIME	01:00:11