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7 *Class Counsel*
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DOCUMENT(S) SOUGHT TO
BE SEALED

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12
13 BYRON MCKNIGHT, JULIAN MENA, TODD
14 SCHREIBER, NATE COOLIDGE, and ERNESTO
15 MEJIA, individually and on behalf of all others
similarly situated,

16 Plaintiffs,

17 v.

18 UBER TECHNOLOGIES, INC., a Delaware
19 Corporation, and RASIER, LLC, a Delaware
Limited Liability Company,

20 Defendants.
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Case No.: 4:14-cv-05615-JST

**DECLARATION OF BRIAN YOUNG IN
SUPPORT OF PLAINTIFFS' RENEWED
MOTION FOR ATTORNEYS' FEES AND
EXPENSES**

Hon, Jon S. Tigar, Presiding

Date: May 6, 2020

Time: 2:00 P.M.

Location: Oakland Courthouse, Courtroom 6 –
2nd Floor, 1301 Clay Street, Oakland, CA
94612

1 I, Brian Young, declare and state as follows:

2 **I. EXPERIENCE AND QUALIFICATIONS**

3 1. I am a Project Manager employed by Epiq Class Action & Claims Solutions, Inc.
4 (“Epiq”), the Court-appointed Settlement Administrator for the above captioned case. Prior to joining
5 Epiq in 2017, I received my Bachelor of Business Administration degree from the University of
6 Wisconsin.

7 2. I am familiar with Epiq’s implementation of the Notice Program in this action, the
8 response thereto by Class Members, and the information provided by Uber in connection with that
9 process. My knowledge of the facts set forth in this declaration is based on this information.

10 3. For the purposes of this Declaration, capitalized terms that are not otherwise defined
11 herein have the same meaning as defined in the Amended Stipulation of Settlement (“Settlement”) filed
12 in this matter on June 1, 2017. ECF No. 125.

13 **II. ESTIMATED CLASS MEMBER AWARDS**

14 4. In October, 2019, Epiq provided Class Counsel and Dr. Leslie Schafer with data
15 concerning the estimated Settlement Shares that Class Members will receive if the Settlement is finally
16 approved. The preliminary data was based on the following assumptions: (i) total Settlement Fund of
17 \$32,500,000; (ii) Attorneys’ Fees award of \$8,125,000; (iii) total incentive awards of \$2,500; (iv)
18 Settlement Administration Fees of \$487,000; (v) litigation expenses award of \$40,783.38 (which
19 includes the \$3,200.63 already awarded by the Court); and (vi) an Uber report that, as of November 30,
20 2019, REDACTED REDACT
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REDACTED REDACT of the Uber Rider Accounts held by Class Members were closed. Collectively, these
21 assumptions are referred to as the “Assumptions” herein. The figures herein are approximations based
22 on the Assumptions.

23 5. As of February, 2020, the number of Class Members who requested to be paid via PayPal,
24 by submitting a Payment Election Form, is 37,659 and their potential Settlement Shares would total
25 \$50,861.36.

26 6. As of February, 2020, the number of Class Members who requested to be paid via
27 payment to their Uber Rider Accounts, by submitting a Payment Election Form, is 18,446 and their
28 potential Settlement Shares would total \$34,485.62.

1 7. As of February, 2020, the number of Class Members who requested to be paid via
2 eCheck, by submitting a Payment Election Form, is 24,009 and, their potential Settlement Shares would
3 total \$32,541.99.

4 8. Under the Assumptions described above, and if distribution proceeds, then
5 approximately 4.8 million Class Members would receive more than \$1.07 each, and approximately
6 244,000 would receive more than \$10 each, with the largest individual award amounting to
7 approximately \$135.40.

8 9. The following table provides more detail on the estimated count and amount of individual
9 Class Member awards under these same Assumptions:

Safe Rides	Total Class Members	Total Safe Rides	Average Award
1-5	12,207,340	26,678,419	\$0.35
6-10	3,034,912	23,306,706	\$0.59
11-15	1,564,640	20,008,379	\$0.84
16-20	980,608	17,494,428	\$1.08
21-30	1,190,655	29,779,951	\$1.45
31-40	712,648	25,037,292	\$1.94
41-50	478,506	21,627,787	\$2.43
51-100	1,093,214	77,028,844	\$3.90
101-200	563,307	77,712,846	\$7.58
201-300	146,522	35,363,777	\$12.48
301-500	74,262	27,720,003	\$19.84
501+	21,471	14,060,240	\$48.46

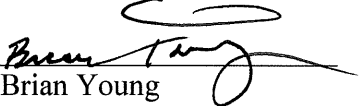
10. If the Assumptions described above are adjusted, such that the total Attorneys' Fees awarded by the Court are reduced by 10% (from \$8,125,000 to \$7,312,500), 15% (to \$6,906,250), or 20% (to \$6,500,000), then the estimated count and amount payments to Class Members who submitted Payment Election Forms would be as follows:

Assumed Attorney Fees Award:	\$8,125,000	\$7,312,500	\$6,906,250	\$6,500,000
Total payout to Class Members who submitted Payment Election Forms:	\$117,888.97	\$122,227.31	\$124,396.47	\$126,566.64
Payout to Class Members who Requested Their Settlement Shares via Uber Rider Account:	\$34,485.62	\$35,810.00	\$36,472.18	\$37,134.37
Payout to Class Members who Requested Their Settlement Shares via PayPal	\$50,861.36	\$52,698.77	\$53,617.47	\$54,536.17
Payout to Class Members who Requested Their Settlement Shares via eCheck:	\$32,541.99	\$33,718.54	\$34,306.82	\$34,895.10

11. Based on the Assumptions, 24% of the Class Members took one (1) Safe Ride.

12. The estimated class member awards in this Declaration are based on the Assumptions, which may change due to: (a) the final Court approved Attorneys' Fees award amount; (b) additional Uber Rider Accounts held by Class Members that have closed; and (c) any discrepancy from our final *pro-rata* calculation of all Settlement Shares. The final class member awards will likely be different from those estimated in this Declaration.

I declare under penalty of perjury under the laws of the United States and the State of Oregon that the foregoing is true and correct. Executed on February 20, 2020 in Beaverton, Oregon.


 Brian Young
 Project Manager
 Epiq Class Action & Claim Solutions, Inc.