

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

FORT LAUDERDALE DIVISION

CASE NO. 17-cv-61617-BB

JOSE MEJIA, an individual, on behalf  
of himself and all others similarly  
situated,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC., a  
Delaware corporation,

Defendant.

**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION**

Plaintiff Jose Mejia ("Plaintiff"), pursuant to Federal Rule of Civil Procedure 34, by and through his undersigned attorneys, hereby requests Defendant, Uber Technologies, Inc. ("Defendant"), to produce for inspection and copying the documents and things described herein.

**I. DEFINITIONS**

A. The terms "document" or "documents" mean the original and all copies of the original which are different in any way from the original (whether by interlineations, receipt stamps notation, indication of copies sent or received, or otherwise) and all attached or annexed materials to any written, typewritten, handwritten, printed, graphic, photographic or recorded material as well as all computer data files, tapes, disks, inputs or outputs, and other computer-readable records or programs, transcripts, and copies and reproductions thereof, however produced or reproduced, now or at any time in your actual or constructive possession, custody or control. The terms "document" or "documents" shall specifically include, but not be limited to,

correspondence, telegrams, facsimiles, telexes, emails, text messages, memoranda, memoranda or records of meetings, conferences, telephone or other communications, pamphlets, books, notes, reports, studies, transcripts, indexes, accounting records of any kind, graphs, diagrams, estimates, minutes (including board and loan committee minutes), tapes, photographs and photographic films, sound recording tapes, phonograph records, video tapes, data compilations from which information can be obtained or can be translated into a form reasonably usable, as well as any contracts or agreements, and records of every kind and type, including any information formerly or presently kept by any method of electronic data processing or magnetic tape storage medium, including the printed output of any such electronic data processing equipment or magnetically stored information.

This definition encompasses all computer records or files on any computers, equipment, machinery, or files in your actual or constructive possession, custody, care, or control.

Accordingly, even if a particular document was deleted, purged, or archived, this document request requires a diligent search of any and all computer records, hard drives, disks, diskettes, floppy disks, or other storage medium on which any document or any information requested herein might reside or be found, specifically including all backup files or any drive containing any backup or copy of any documents requested herein.

B. The term “things” means tangible or intangible property not otherwise defined as the document.

C. The term “copy” or “copies” when used in reference to a document means any color or black-and-white facsimile reproduction of a document, regardless of whether the facsimile reproduction is made by means of carbon paper, pressure sensitive paper, xerography or other means or process.

D. The term “communication” and “communications” refers to the act or fact of communicating, whether orally, nonverbally, telephonically, telegraphically, in writing, by recording, or other, and means any written or oral conversation, including, but not limited to, telephone conversations and meetings, letters, facsimile, and email communications.

E. The term “information” means data of any kind recorded in any language, including machine language and recorded numerically, and in any form of expression.

F. The terms “act” or “acts” means any act, transaction, decision, communication, statement, conduct, meeting, or any other type of event or occurrence (hereinafter collectively referred to as “act” or “acts”).

G. The terms “and” and “or” shall be construed conjunctively rather than disjunctively, as is necessary to make each request inclusive rather than exclusive.

H. The term “evidencing” means pertaining to, relating to, showing, being connected to or associated with, or referring to and/or referencing.

I. The term “produce” means to make available the documents or things requested herein for inspection and copying, and to separate such documents into the categories set forth in this request.

J. The term “Uber” shall mean Uber Technologies, Inc., the Defendant in this action, and shall include its assignors, predecessors, successors, affiliates, subsidiaries, parent corporations, divisions, units, including present and former officers, directors, agents, employees, or representatives of any of the foregoing, including all persons acting or purporting to act on behalf of any of the foregoing, experts, persons consulted concerning any factual matter or matters of opinion relating to any of the facts or issues involved in this action, and, unless privileged, the parties’ attorneys.

K. The term “You” or “Your” shall mean Uber.

## **II. INSTRUCTIONS**

1. These requests seek production of all documents in their entirety, without abbreviation, expurgation or redaction.
2. Complete documents, including all attachments, coversheets, appendices, etc., shall be produced if any part of the document is responsive to a request.
3. Documents shall be produced as they are kept in the usual course of business or shall be labeled and organized to correspond to each request to which they are responsive.
4. You must furnish all responsive documents in your possession, custody or control after making a diligent search of their records and materials. If you are unable to obtain the documents requested, you should explain the circumstances and what steps were taken toward obtaining the documents.
5. If any of the documents requested herein have been lost, discarded or destroyed, identify and describe such documents as completely as possible, including, but not limited to, the date of disposal, reason for disposal and/or persons authorizing the disposal.
6. Requests for deposition transcripts shall be produced only if a copy was ordered prior to the date of this document request. If a copy of such deposition transcripts is ordered subsequently, you must produce a copy at that future time.
7. If not otherwise indicated or obvious from the request, the relevant time period for these requests is January 1, 2013, to the present.

## **III. CLAIM OF PRIVILEGE**

If you assert a claim of privilege or other protection from discovery in responding or objecting to any of these requests and any documents are not provided on the basis of such assertion:

(a) as to each document, identify the nature of such privilege, including work-product and/or attorney-client, and any other claim for protection from discovery; and

(b) as to each document, provide the following information: (i) the type of document; (ii) the general subject matter of the document; (iii) the date of the document; (iv) such other information as is sufficient to identify the document for purposes of a subpoena duces tecum, including the author, addressee and any other recipient of the document, including those blind-carbon-copied (“bcc”), including each attorney acting on behalf of such; and (v) such other information as is sufficient to determine the validity of the claim of privilege or other protection from discovery.

#### **IV. TIME AND PLACE FOR PRODUCTION**

The production should occur within 30 days of the date of these requests, at 10:00 a.m. at the law office of BECK & LEE TRIAL LAWYERS, Corporate Park at Kendall, 12485 SW 137th Avenue, Suite 205, Miami, Florida 33186. The inspection and copying of the documents will continue so long as reasonably required.

#### **V. DOCUMENTS AND THINGS REQUESTED**

1. All contracts, or agreements between Uber and Jose Mejia, the Plaintiff in this action. Please identify which documents are responsive to this request.

2. All marketing and/or promotional materials used to attract new Uber drivers. Please identify which documents are responsive to this request.

3. All documents and correspondence discussing the duties and responsibilities of Uber drivers. Please identify which documents are responsive to this request.

4. All documents and correspondence regarding the firearm prohibition in Florida. Please identify which documents are responsive to this request.

5. All correspondence between Uber and Jose Mejia, the Plaintiff in this action.

Please identify which documents are responsive to this request.

6. All documents and correspondence in connection with incidents regarding assault and/or battery committed against Uber drivers in Florida. Please identify which documents are responsive to this request.

7. All documents and correspondence in connection with Florida Statute § 790.06. Please identify which documents are responsive to this request.

8. All documents and correspondence in connection with Florida Statute § 790.251. Please identify which documents are responsive to this request.

9. All documents and correspondence in connection with Uber's firearms policy. Please identify which documents are responsive to this request.

10. All documents in connection with the number of Uber drivers in Florida. Please identify which documents are responsive to this request.

11. All documents in connection with the number of Uber drivers nationwide. Please identify which documents are responsive to this request.

12. All documents and correspondence in connection with any Uber driver who has a concealed carry license pursuant to Florida law. Please identify which documents are responsive to this request.

13. All documents and correspondence in connection with any Uber driver who has a concealed carry license pursuant to any local law. Please identify which documents are responsive to this request.

14. All documents and correspondence in connection with any Uber driver carrying firearms while utilizing the Uber application, whether legally licensed or not. Please identify which documents are responsive to this request.

15. All documents and correspondence in connection with any incident involving firearms, involving an Uber driver or a passenger during or near the time of an Uber ride. Please identify which documents are responsive to this request.

16. All documents and correspondence in connection with any gun fatalities involving an Uber driver or a passenger during or near the time of an Uber ride. Please identify which documents are responsive to this request.

17. All documents and correspondence in connection with any Uber passenger with a concealed carry license. Please identify which documents are responsive to this request.

18. All documents and correspondence in connection with Uber's enforcement policies, if any, of its firearms policy against passengers. Please identify which documents are responsive to this request.

19. All documents and correspondence in connection with Uber's enforcement policies, if any, of its firearms policy against drivers. Please identify which documents are responsive to this request.

20. All documents and correspondence in connection with Uber's policies on driver and/or rider safety. Please identify which documents are responsive to this request.

*~signature page follows~*



DATED: November 20, 2017

/s/ Elizabeth Lee Beck

By: Elizabeth Lee Beck

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*Attorneys for Plaintiff and the Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2017 a true and correct copy of the foregoing

*PLAINTIFF'S FIRST REQUEST FOR PRODUCTION*

was sent by U.S. Mail and E-Mail to:

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By: /s/ Elizabeth Lee Beck  
Elizabeth Lee Beck