



**DECLARATION OF JEFFREY BRANDT IN SUPPORT OF REQUEST OF LYFT, INC.
CONFIDENTIAL TREATMENT OF CERTAIN DATA IN LYFT'S 2026 ANNUAL REPORTS**

FILED

I, Jeffrey Brandt, declare and state as follows:

10/30/26

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1. I make this declaration in support of Lyft, Inc.'s ("Lyft") request for confidential treatment of certain data submitted to the Commission in Lyft's Annual Reports for the Period January 1, 2026 through December 31, 2026. This declaration is submitted pursuant to General Order 66-D. Lindsay Llewellyn, Chief Legal Officer and Corporate Secretary of Lyft, has delegated signing authority for this declaration to me.

2. I am a Senior Director of Regulatory Compliance at Lyft. In my capacity as Senior Director, Regulatory Compliance, I am familiar with Lyft's operations, its data collection, storage, and analysis policies and practices, and the processes employed in preparing its Annual Report. In that capacity, I have also become knowledgeable regarding the collection of and uses for vehicle mobility data, such as the trip data collected by Lyft, as well as the utility of that data for a variety of purposes and the economic value that flows from that utility.

3. I have personal knowledge of the truth of all matters set forth herein, except those matters which constitute legal argument or rely upon third party sources, and as to those matters, I believe them to be legally supported and/or true and accurate, as appropriate.

4. I am aware that on or about December 21, 2020, Administrative Law Judge Robert Mason issued an order on Lyft's motion for confidential treatment of portions of its 2020 Annual Report, granting the motion in part and denying in part ("2020 Ruling"). I rely upon the 2020 Ruling, the evidence and argument submitted by Lyft in connection with its motion for confidential treatment of its 2020 Annual Report, as well as Decisions 22-05-003 and 23-02-041 affirming the 2020 Ruling, in seeking confidential treatment as to those fields which the 2020 Ruling determined may be redacted and treated confidentially.

5. Those fields are as follows:¹

Report	Field
Requests Accepted	
	Waybill1; Waybill2; Waybill3; Waybill4; Waybill5; Waybill6; Waybill7
	DriverID
	VIN
	AppOnOrPassengerDroppedOffLat; AppOnOrPassengerDroppedOffLong
	TripReqRequesterLat; TripReqRequesterLong
	TripReqDriverLat;

¹ The appendices to the ALJ's Confidentiality Ruling do not consistently track the descriptions given those fields by CPED. For clarity, Lyft has identified each specific field using the nomenclature provide by CPED in the 2021 templates.

	TripReqDriverLong
	ReqAcceptedLat; ReqAcceptedLong
	PassengerPickupLat; PassengerPickupLong
	PassengerDropoffLat; PassengerDropoffLong
Requests Accepted Periods	
	DriverID
	VIN
	PeriodStartLat
	PeriodStartLong
	PeriodEndLat
	PeriodEndLong
Requests Not Accepted	
	DriverID
	VIN
	TripReqRequesterLat
	TripReqRequesterLong
	TripRequesterDestinationLat
	TripRequesterDestinationLong
	NotAcceptedDriverLat
	NotAcceptedDriverLong
Assaults & Harassments	
	Waybill1; Waybill2; Waybill3; Waybill4; Waybill5; Waybill6; Waybill7
	DriverID
	VIN
	AssaultHarassLat
	AssaultHarassLong
	AssaultHarassType; AssaultHarassDef
	AssaultHarassDescr
Accidents & Incidents	
	Waybill1; Waybill2; Waybill3; Waybill4; Waybill5; Waybill6; Waybill7
	DriverID
	VIN
	IncidentAccidentLat
	IncidentAccidentLong
	AmountPaidAnyParty
	AmountPaidDriverIns
	AmountPaidTNC
	AmountPaidOther
Driver Names & IDs	
	DriverID

	DriverFirstName
	DriverMI
	DriverLastName
	DriverLicNum
	DriverLicState
	DriverLicExp
Accessibility Complaints	
	DriverID
50,000+ Miles	
	DriverID
	VIN
Number of Hours	
	DriverID
Number of Miles	
	DriverID
Law Enforcement Citations	
	Waybill1; Waybill2; Waybill3; Waybill4; Waybill5; Waybill6; Waybill7
	DriverID
	VIN
Off-platform Solicitation	
	DriverID
	VIN
	OffPlatformSolicitationLat
	OffPlatformSolicitationLong
Suspended Drivers	
	DriverID
Zero Tolerance	
	Waybill1; Waybill2; Waybill3; Waybill4; Waybill5; Waybill6; Waybill7
	DriverID
	VIN
	ZeroToleranceLat
	ZeroToleranceLong

6. In addition to the fields referenced in paragraph 5 above, Lyft seeks confidential treatment of the fields below, which include detailed information concerning individual trips completed on the Lyft platform over the preceding year down to the Census Block level. Specifically, Lyft seeks confidential treatment for the following additional fields:

Report	Field
Requests Accepted	
	VehicleMake
	VehicleModel
	VehicleYear

	AppOnOrPassengerDroppedOffZip
	AppOnOrPassengerDroppedOffTract
	AppOnOrPassengerDroppedOffCB
	AppOnOrPassengerDroppedOffDate
	TripReqRequesterZip
	TripReqRequesterTract
	TripReqRequesterCB
	TripReqDriverZip
	TripReqDriverTract
	TripReqDriverCB
	TripReqDate
	ReqAcceptedDate
	ReqAcceptedZip
	ReqAcceptedTract
	ReqAcceptedCB
	PassengerPickupDate
	PeriodTwoMilesTraveled
	PassengerPickupZip
	PassengerPickupTract
	PassengerPickupCB
	PassengerDropoffDate
	PassengerDropoffZip
	PassengerDropoffTract
	PassengerDropoffCB
	PeriodThreeMilesTraveled
	TotalAmountPaid
	PassengerPickupDatePrescheduled
	RideIDMilesTraveledP23
	RideIDMilesTraveledP3
	Driver Pay
Requests Not Accepted	
	VehicleMake
	VehicleModel
	VehicleYear
	TripReqDate
	TripReqRequesterZip
	TripReqRequesterTract
	TripReqRequesterCB
	TripRequesterDestinationZip
	TripRequesterDestinationTract
	TripRequesterDestinationCB
	NotAcceptedDate
	NotAcceptedDriverZip
	NotAcceptedDriverTract
	NotAcceptedDriverCB

Accidents and Incidents	
	VehicleMake
	VehicleModel
	VehicleYear
	IncidentAccidentDate
	Collision Severity

7. For convenience, Lyft refers to this data collectively as “Trip Data.” Lyft seeks confidential treatment of the Trip Data on several grounds, including without limitation, that the data is exempt from disclosure under the California Public Records Act as it constitutes a trade secret and disclosure would constitute an unwarranted invasion of privacy and violate the California and United States Constitutions. As to both the trade secret and the privacy issue, Lyft relies upon the previously filed declaration of Dr. Jan Whittington and Dr. Feiyang Sun, filed on February 13, 2026 on the docket of this proceeding, and incorporates it by reference as if fully restated herein. Lyft relies upon the analysis and opinions of Drs. Whittington and Sun to supplement the conclusions in this declaration and to support the legal analysis included in Lyft’s Motion for Confidential Treatment.

**THE TRIP DATA CONSTITUTES A TRADE SECRET EXEMPT FROM
DISCLOSURE UNDER GOVERNMENT CODE § 7927.705 AND EVIDENCE
CODE §1060**

8. Because the Trip Data has substantial, nontrivial independent commercial value apart from its value in allowing Lyft to comply with regulatory requirements, and is subject to reasonable efforts to maintain its confidentiality, it is protected from disclosure as a trade secret pursuant to Government Code § 7927.705, Civil Code §3426.1(d),² and Evidence Code §1060.

9. The Trip Data includes an array of information regarding every ride request on the Lyft platform during the reporting period. The Trip Data is among the most sensitive and valuable data collected and maintained by Lyft. Trip data is captured using data collection, analysis and reporting processes developed by Lyft over time and at great effort and expense. Lyft has invested thousands of person hours and many millions of dollars in developing and refining its ridesharing platform and its data collection processes and procedures, and in acquiring the market share and customer base, which make collection of various data elements regarding millions of individual rides possible. Recreating this platform and processes, and acquiring the market share and customer base necessary to collect this same compilation of Trip Data from millions of individual rides would require similarly substantial investments in time, money, effort and ingenuity.

10. The systems and processes developed by Lyft continually capture events occurring across the Lyft platform and store the resulting data in Lyft’s proprietary databases. The data is

² Pursuant to Civil Code §3426.1(d), a trade secret is “information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.”

used in Lyft's operations and is compiled for both regulatory reporting *and* business analytics purposes. In addition to enabling Lyft to adapt to continually-evolving regulatory requirements, which provides an advantage over would-be competitors, the data provides Lyft with critical insights into the effectiveness of its services, features, and marketing and promotional efforts, and helps Lyft to create an exceptional user experience for passengers and drivers.

11. Importantly, although Lyft formats the Trip Data to conform to CPED data reporting requirements when submitting its Annual Reports, that very same data has substantial value wholly apart from its value in allowing Lyft to comply with regulatory requirements. The data is continually collected, compiled, and analyzed as an integral aspect of Lyft's business operations, as the success of Lyft's business model depends upon continually optimizing the balance between ride demand and driver supply. Lyft endeavors to optimize supply and demand by using competitive pricing and promotions, such as ride credits and other discounts, to stimulate passenger demand, while increasing the supply of drivers to areas with high demand by offering drivers bonuses, and other driver incentives. Lyft is continually adjusting these two levers to ensure, on the one hand, that fares and/or discounts are sufficiently enticing to attract passengers, and, on the other hand, that fares and driver promotions and incentives are sufficiently enticing to attract enough drivers to meet demand at any given time. This delicate balance is central to Lyft's competitiveness in California and in markets nationwide and the Trip Data allows Lyft to dynamically evaluate the effectiveness of its promotional, advertising, and incentive campaigns used to balance supply and demand.

12. For example, by comparing the number and variety of rides completed during a particular time period in a particular area (e.g., a zip code, census block, city, or county) against the driver incentive programs deployed during that period for that area, Lyft can gauge the effectiveness of those incentives in increasing the supply of drivers and can adjust its incentive programs going forward. Similarly, by cross-referencing the number and variety of rides against the particular passenger promotions run at that time, Lyft can track, assess, and understand the efficacy of its passenger-directed promotions, and can adjust them accordingly. Equally important, Lyft can identify those promotions that are ineffective and can avoid further expenditures on ineffective promotions. The ability to effectively measure the real-world effectiveness of its promotions and incentives using metrics collected during each individual trip allows Lyft to save a tremendous amount of time and effort on ineffective campaigns or promotions.

13. To the best of my knowledge, no other company or individual has the ability to collect the same data from rides completed on the Lyft platform, making Lyft's Trip Data truly unique and distinct from data sets that may be collected by other TNCs concerning their own rides or by other companies from other vehicle-connected GPS. There is no other source of this extremely valuable data and to Lyft's knowledge, no one else maintains or is capable of generating the same compilation of data elements as those contained in Lyft's Trip Data.

14. Importantly, although Lyft's promotions and incentives are publicly available and not maintained as a trade secret, without access to the data that Lyft maintains as a trade secret – the Trip Data – a competitor or would-be competitor would not be able to effectively assess which promotions were successful and which were not. The Trip Data is the key to

understanding the success or failure of a given campaign or promotion. If competitors had access to the Trip Data they could track those fares and promotions and analyze how the number or variety of rides fluctuated in response to changes in fares or promotional activities. They could then adjust their fares, or copy those promotions that the data shows were successful, in order to drive new customers to their platforms. Such insights would be enormously valuable to a competitor, who would not need to invest the significant resources that Lyft has invested to test these programs and analyze the data to understand the market and optimize revenue generation. A new competitor could enter the market with a substantially reduced investment in money and human resources, while existing competitors could use the data to increase their market share, reduce their costs, or undercut Lyft's marketing campaigns, by "free-riding" on Lyft's data. I am confident in these assessments as I know that if Lyft were to obtain access to the trip data of its competitors, such as the trip data submitted by Uber in its Annual Reports, Lyft would devote substantial resources to analyzing the data to assess the competitor's market share, its promotional initiatives, and other aspects of its business operations to gain insights that might be useful to Lyft in modifying its promotions or operations.

15. It is my opinion, based upon my years of experience in the TNC field and knowledge I have acquired in preparing this Declaration concerning efforts by third parties to inquire regarding the purchase of Lyft's Trip Data, that mobility data collected from GPS-connected vehicles or mobile devices in vehicles, such as the Trip Data here, has enormous commercial value for a variety of purposes and organizations, not just TNCs. In fact, I am aware that an active market has developed for the sale or licensing of such data. For example, a company called Datarade hosts an online marketplace to facilitate the sale or licensing of mobility data, including vehicle mobility data. The website and online marketplace can be found here: <https://datarade.ai/data-categories/mobility-data>. Among the data vendors participating in this marketplace is a company called PreDik, which sells mobility data with GPS coordinates at the two decimal level of granularity.³ As explained by the Wisconsin State Cartographer's office at the University of Wisconsin-Madison, GPS coordinates at the two decimal level are only sufficient to identify a location within approximately 1.11 kilometers, or .69 miles.⁴ As the United States Census Bureau explains, census blocks are roughly the size of a city block and can be as small as .69 acres.⁵ I note this to illustrate that the mobility data offered for sale by PreDik is equivalent in granularity to the Trip Data at issue in this Motion. PreDik promotes this data "for Location Intelligence, Demand Forecasting, Retail Site Selection, Geomarketing, and Revenue Forecasting," and asserts that the data would allow interested parties to make inferences regarding "pedestrian influx, vehicle flow, resident population, income level, and

³ See <https://datarade.ai/data-products/sales-forecast-data-and-best-location-finder-predik-data-driven> (last accessed June 6, 2023).

⁴ See <https://www.sco.wisc.edu/2022/01/21/how-big-is-a-degree/#:~:text=Therefore%20we%20can%20easily%20compute,further%20subdivisions%20of%20a%20degree.&text=circumference%20of%2025%2C000%20miles>, last accessed June 2, 2023; Alternatively, one can calculate the distance between two points identified by GPS coordinates at the two decimal level using this calculator produced by the National Oceanic and Atmospheric Administration, which shows the distance ranges from 1 to 3 kilometers depending where on Earth the two points are. <https://www.nhc.noaa.gov/gccalc.shtml>, last accessed June 2, 2023.

⁵ <https://www.census.gov/newsroom/blogs/random-samplings/2011/07/what-are-census-blocks.html> (census block about the size of a city block); <https://www2.census.gov/geo/pdfs/reference/GARM/Ch11GARM.pdf>, at p. 11-10 (census blocks as small as .69 acre).

business concentration.”⁶ It further suggests that “it is possible to add existing points of sale and their respective revenue” to that data and that “[t]his additional information makes it possible to estimate the billing of an additional point of sale in the best areas identified to locate a specific type of business.”⁷ Although I cannot independently verify the claims made by PreDik concerning its data without access to that data, these claims corroborate my view that mobility data at this same or similar level of granularity has substantial economic value for a variety of purposes, such as those identified by PreDik.

16. Lyft’s Trip Data, which reflects vehicle flow between geographic areas at different times of day, could be used for similar purposes, including analyzing commuting patterns, studying traffic congestion, identifying potential marketing opportunities, or studying human behavior for myriad other purposes. For example, assume that the Trip Data showed that an average of 285 trips commence in the 94611 zip code (Piedmont) between the hours of 6:00 AM and 7:00 AM on weekdays and terminate in the 94111 zip code (SF financial district), with an average trip time of 58 minutes. One might use this data for a number of salutary purposes, including understanding traffic congestion along the 580 and 80 freeways at various points in time, the commercial value of electronic billboards targeting affluent customers along such corridors and the kinds of ads that might generate higher ad rates, whether to open a branch of a high end food service business focused on breakfast items along this corridor or a particular census block within the 94111 zip code, the utility of adding another ferry between Alameda and the Ferry Building during the summer months, for timing deliveries between distribution facilities in those or adjacent zip codes, etc. The potential uses for a database of this size which documents mobility patterns by location and time of day is virtually endless.

17. I am also aware of another company called Streetlight Data, which is focused on selling “anonymized location records from smart phones and navigation devices in connected cars and trucks.” The website for Streetlight Data can be found here. <https://www.streetlightdata.com/our-data/>. In addition, I am aware that consulting firms, such as McKinsey & Co, have issued reports analyzing the monetary value of mobility data collected from smart phones and GPS connected vehicles – essentially the same data at issue here. See “Unlocking the Full Life-Cycle Value from Connected Car Data,” at <https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/unlocking-the-full-life-cycle-value-from-connected-car-data#>; see also “Car Data: Paving the Way to Value-Creating Mobility,” at https://www.the-digital-insurer.com/wp-content/uploads/2016/05/704-mckinsey_car_data_march_2016.pdf. McKinsey & Co, is a well-known and highly regarded consulting firm. Each of the foregoing authorities helps to confirm my own view that vehicle-connected mobility data, such as Lyft’s Trip Data, has tremendous economic value for a variety of purposes wholly apart from Lyft’s use of the data for its own operations or for compliance purposes.

18. In fact, I understand that the San Francisco Municipal Transportation Agency has stated in comments submitted in this rulemaking that the Trip Data at issue here is “extremely valuable” for a variety of purposes, including understanding traffic patterns, infrastructure

⁶ <https://datarade.ai/data-products/sales-forecast-data-and-best-location-finder-predik-data-driven> (last accessed June 6, 2023).

⁷ *Id.*

planning, and allocating resources.⁸ I also understand that San Francisco conceded that Trip Data has substantial monetary value in its comments, stating that the Commission's earlier treatment of TNC Trip Data as confidential "forced the TA to allocate hundreds of professional staff hours and tens of thousands of dollars to find alternative sources of data to inform its recent analysis of the impact of TNC service on traffic congestion in San Francisco."⁹

19. I am also aware that Lyft has been approached by at least one third party who was interested in purchasing access to Lyft's Trip Data. The fact that a third party expressed interest in paying Lyft for access to the Trip Data provides still further evidence of the independent economic value of that data. Ordering the disclosure of Lyft's Trip Data would deprive Lyft of potential economic opportunities associated with the possession of Trip Data.

20. Lyft stores the Trip Data on a secure software network protected by appropriate computer security controls, access to which is limited to a subset of Lyft employees who have been individually approved and use such information only to fulfill their job functions. Lyft also requires, as a condition of employment, that all new employees sign a confidentiality agreement. This agreement is put in place to protect Lyft's proprietary information from being disclosed by employees or former employees to unauthorized outside parties. The company also requires all employees to sign Lyft's employee handbook, which describes in detail each employee's obligations regarding technology use and security and protection of Lyft's confidential and proprietary information; and requires all visitors to Lyft headquarters to read and sign a non-disclosure agreement before proceeding past the reception desk. Furthermore, since the Commission issued General Order 66-D, Lyft has consistently complied with that order in seeking confidential treatment for the data it has identified as confidential herein, and otherwise vigorously protects such information from public disclosure.

21. Lyft has provided access to its Trip Data to Dr. Jan Whittington and Dr. Feiyang Sun pursuant to a written Non-Disclosure Agreement which requires them to maintain the confidentiality and security of that data and prohibits use of the data except as provided therein. The data for which Lyft seeks confidential treatment here, from the 2025 calendar year, is materially the same as the Trip Data analyzed by Drs. Whittington and Sun and presents the same trade secret and privacy issues as that data. Thus, the opinions in my declaration and that of Drs. Whittington and Sun apply equally to the 2025 Trip Data.

**DISCLOSURE OF THE TRIP DATA WOULD CONSTITUTE AN
UNWARRANTED INVASION OF PRIVACY UNDER GOVERNMENT CODE §
7927.700 AND IS PROHIBITED BY GOV. CODE, § 7930.100**

22. Public disclosure of the Trip Data would allow third parties to identify particular

⁸ See San Francisco Opening Comments on Phase III.B Scoping Memo and Ruling (July 17, 2017), p. 9; p. 8 (explaining "how useful [Trip D]ata is to make critical transportation decisions in San Francisco and how valuable it could be statewide.")

⁹ Opening Comments of the San Francisco Municipal Transportation Agency, San Francisco County Transportation Authority, San Francisco City Attorney's Office, and San Francisco International Airport To Phase III.C Scoping Memo And Ruling Of Assigned Commissioner: Track 3 — TNC Data ("San Francisco III.C Comments"), filed December 3, 2019, p. 10.

individuals and track their movements, potentially exposing them to danger, embarrassment, ridicule, liability, or other negative consequences. As a result, the data is protected from disclosure pursuant to Government Code § 7927.700, as a file the disclosure of which would constitute an unwarranted invasion of privacy, § 7927.705, which incorporates protections of other laws, and § 7930.100, which expressly incorporates the Right of Privacy guaranteed by Article I, Sect. 1, of the California Constitution. Disclosure of the Trip Data would also violate Lyft's own right to privacy, which is protected by § 7927.705 and the Fourth Amendment to the United States Constitution.

23. Lyft establishes the factual basis for its confidentiality request on privacy grounds through the concurrently filed declaration of Drs. Whittington and Sun, and the evidence and authorities cited therein.

24. I am aware that for the 2023 Transportation Network Company Annual Report, the Commission has added a new data category to the Requests Accepted report called "Driver Pay," which, according to the Annual Report Data Dictionary provided by Commission staff, includes the total amount paid to the driver for the trip.

25. The total amount of earnings for a given ride on a specific date, particularly when disclosed in connection with other trip-level data, is competitively sensitive and protected as a trade secret pursuant to Government Code § 7927.705 and Evidence Code § 1060. As explained in my Initial Declaration, Lyft's business model depends upon efficiently balancing driver supply with passenger demand. A key determinant of Lyft's ability to compete for drivers is its ability to set potential earnings at a level sufficient to attract enough drivers to the platform to meet passenger demand. Lyft does so by establishing standard earnings levels and offering promotions or other enhancements aimed at increasing the number of drivers available on its platform. Thus, the total amount of actual earnings on a per-ride basis reflects not only standard earnings rates, but also whether a given promotion was in effect and whether the driver took advantage of that promotion. When reported on a ride-level along with other data elements related to a given ride, a competitor could determine what incentives were offered, and when and how many drivers took advantage of those promotions, allowing a competitor or potential competitor to free-ride on Lyft's efforts without the substantial investments necessary to acquire that knowledge through trial and error. Although some of these factors are publicly available, such as certain promotional campaigns, other factors are not, and Lyft does not publicly disclose how the combination of these factors impacts driver earnings for a given ride, and thus Lyft's ability to compete to attract and retain drivers.

26. The driver earnings information would be extremely valuable to Lyft's competitors because they could study the information to gain insights into how much drivers can earn on the Lyft platform per-trip, over the course of a given day, week, or year, and based on factors such as trip location, duration, and length. This would allow competitors to make assumptions about the proprietary algorithms underlying driver earnings on the Lyft platform, which are the product of extensive and continual investment by Lyft. Disclosure of the amount earned for each ride completed on Lyft's platform, particularly if disclosed along with numerous other data elements on a per-ride basis, would allow Lyft's competitors to undercut Lyft's ability to attract and retain drivers, and thus its ability to balance driver supply with passenger demand.

27. Lyft has expended at least hundreds of person hours developing and optimizing the algorithms underlying driver earnings and incentives, and analyzing the extent to which these incentives impact the supply of drivers at given times and locations.

28. Although individual Lyft drivers are informed and aware of the amount paid for a given ride that they complete, Lyft maintains the algorithms used to determine driver earnings as a trade secret and does not publicly disclose the total amounts paid to Lyft drivers on a per ride basis, except as may be required by law, and in such case, Lyft requests confidential treatment for that data. Lyft stores the Driver Pay data on a secure software network protected by appropriate computer security controls, access to which is limited to a subset of Lyft employees who have been individually approved and use such information only to fulfill their job functions. Lyft also requires, as a condition of employment, that all new employees sign a confidentiality agreement. This agreement is put in place to protect Lyft's proprietary information from being disclosed by employees or former employees to unauthorized outside parties. The company also requires all employees to sign Lyft's employee handbook, which describes in detail each employee's obligations regarding technology use and security and protection of Lyft's confidential and proprietary information; and requires all visitors to Lyft headquarters to read and sign a non-disclosure agreement before proceeding past the reception desk.

29. Collision Severity. I am also aware that the 2024 data dictionary and Annual Report templates added a new category — Collision Severity — to the Accidents and Incidents report. Lyft seeks confidential treatment of this information on the same grounds as it seeks confidential information for the location and related data outlined above, as well as the Vehicle Make, Model, and Year and IncidentAccidentDate fields. The inclusion of vehicle identifying information and the precise date and time to the second of the incident, along with information reported in the Requests Accepted report, could allow for individuals to be re-identified, which would result in disclosure of confidential medical information, including whether the individual complained of pain, suffered severe injuries, or even died. For these reasons, as explained in the accompanying motion for confidential treatment, disclosure of Collision Severity, Vehicle Make, Model and Year and IncidentAccidentDate fields would result in an unwarranted invasion of privacy under the provisions of the Government Code referenced in paragraph 23 above.

30. Lyft reserves its rights to assert other bases for confidential treatment and expressly reserves its rights under California law to file a lawsuit on the foregoing grounds, or on other grounds, to prevent disclosure of this information.

I declare, under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on October 30, 2026, at San Francisco, California.



Jeffrey Brandt