

## Exhibit F

### **Settlement Administration Protocol**

This Settlement Administration Protocol (the “Protocol”) is a part of the Amended Stipulation of Settlement and shall be used by the Settlement Administrator to review, address, implement, and process those Payment Election Forms submitted pursuant to the Amended Stipulation of Settlement and otherwise implement the terms of the payment election process in the Amended Stipulation of Settlement. All capitalized terms used in this Protocol shall have the same meaning given them in the Amended Stipulation of Settlement. To the extent there is any conflict between the Amended Stipulation of Settlement and this Protocol, the Amended Stipulation of Settlement shall govern.

#### **1. Settlement Administrator’s Role and Duties**

- (a) The Settlement Administrator must consent, in writing, to serve and shall abide by the obligations of the Amended Stipulation of Settlement, this Protocol, and the Orders issued by the Court.
- (b) The Settlement Administrator shall be reimbursed from the Settlement Fund toward reasonable costs, fees, and expenses of providing notice to the Class and administering the Settlement in accordance with the Amended Stipulation of Settlement and the contract executed with the Settlement Administrator with respect to its services in the Action and to this Settlement (the “Contract”).
- (c) The Settlement Administrator warrants that it knows of no reason why it cannot fairly and impartially administer the payment election process set forth in the Amended Stipulation of Settlement.
- (d) The Settlement Administrator shall keep a clear and careful record of all communications with Class Members, all payment election decisions, all expenses, and all tasks performed in administering the payment election process.
- (e) The Settlement Administrator shall take all reasonable efforts to administer the Payment Election Forms efficiently and to avoid unnecessary fees and expenses. As soon as work commences, the Settlement Administrator shall provide a detailed written accounting of all fees and expenses on a regular basis to Class Counsel and Defense Counsel, and shall respond promptly to inquiries by Class Counsel and Defense Counsel concerning the administration and notice fees and expenses.

The Parties are entitled to observe and monitor the performance of the Settlement Administrator to assure compliance with the Amended Stipulation of Settlement and this Protocol. The Settlement Administrator shall promptly respond to all and provide a complete response and/or any and all materials in its possession following an inquiry and request for information made by Uber, Defense Counsel, or Class Counsel.

**2. Locating, Obtaining, and Submitting Payment Election Forms**

- (a) The Payment Election Form, which is substantially similar to the form attached as Exhibit “C” to the Amended Stipulation of Settlement, shall be available as part of the Class Notice, on the Internet website at [www.RideShareSettlement.com](http://www.RideShareSettlement.com), in response to requests through the toll-free voice response unit with message and interactive voice response (IVR), and also through contacting by telephone or by mail or other similar service the Settlement Administrator and requesting a copy of the Payment Election Form be sent to them. The Payment Election Form on the Internet website and the hard copy Payment Election Form shall be consistent in all substantive respects.
- (b) The Payment Election Form may be rejected and thus treated as if it was not submitted for the reasons identified 3(b) below.
- (c) Class Members may submit a Payment Election Form to the Settlement Administrator prior to the Payment Election Deadline.
- (d) Elections may be submitted by completing the Payment Election Form in hard copy by mail or other similar delivery service or on-line through a web-based Payment Election Form at the Internet website, [www.RideShareSettlement.com](http://www.RideShareSettlement.com).
- (e) The Settlement Administrator shall establish and maintain an Internet website, [www.RideShareSettlement.com](http://www.RideShareSettlement.com), that shall be easily accessible through commonly used Internet Service Providers for the submission of elections. The Long Form Notice, Payment Election Form, Amended Stipulation of Settlement and its exhibits, the Consolidated Class Action Complaint, and any Motion for Preliminary Approval of the Settlement, Final Approval of the Settlement, and for Award of Attorneys’ Fees and Incentive Awards (including supporting declarations and exhibits) shall be available on

the Internet website. The Internet website shall be designed to permit Class Members to readily and easily submit the Payment Election Form and obtain information about the Class Members' rights and options under the Amended Stipulation of Settlement. The Internet website shall be maintained continuously until the expiration of all deadlines to seek reconsideration and appellate review of the Final Order and Final Judgment. The Settlement Administrator shall be solely responsible for receiving and processing the Payment Election Forms and for promptly delivering blank Payment Election Forms to the Class Members who request them.

- (f) The Settlement Administrator also shall establish a toll-free telephone number, through which Class Members may obtain information about the Action and the Settlement and request a mailed copy of the Long Form Notice and/or the Payment Election Form, pursuant to the terms and conditions of this Amended Stipulation of Settlement.

**3. Payment Election Form Review and Processing**

- (a) The Settlement Administrator shall begin the payment election process so that it is completed prior to the Payment Election Deadline.
- (b) Payment Election Forms that do not meet the requirements set forth in the Amended Stipulation of Settlement and in the Payment Election Form instructions shall be rejected. Where a good faith basis exists, the Settlement Administrator may reject a Class Member's Payment Election Form for, among other reasons, the following:
  - (i) Failure to fully complete and/or sign the Payment Election Form;
  - (ii) Illegible Payment Election Form;
  - (iii) The person submitting the Payment Election Form is not a Class Member;
  - (iv) The Payment Election Form is fraudulent;
  - (v) The Payment Election Form is duplicative of another Payment Election Form;

- (vi) The person submitting the Payment Election Form is requesting that the Settlement Share be paid to a person or entity that is not the Class Member for whom the Payment Election Form is submitted;
  - (vii) Failure to submit a Payment Election Form by the deadline; and/or
  - (viii) The Payment Election Form otherwise does not meet the requirements of the Amended Stipulation of Settlement.
- (c) The Settlement Administrator shall determine whether a Payment Election Form meets the requirements set forth in the Amended Stipulation of Settlement. Each Payment Election Form shall be submitted to and reviewed by the Settlement Administrator, who shall determine in accordance with the terms and conditions of the Amended Stipulation of Settlement the extent, if any, the Payment Election Form is valid. The Settlement Administrator shall have the authority to determine whether a Payment Election Form submitted by any Class Member is complete and timely. The Settlement Administrator shall use all reasonable efforts and means to identify and reject duplicate and/or fraudulent Payment Election Forms, including, without limitation, indexing each Class Members' Settlement Share.
- (d) The Payment Election Form will be deemed to have been submitted when posted, if received with a postmark or equivalent mark by a courier company indicated on the envelope or mailer with the instructions set out in the Payment Election Form. In all other cases, the Payment Election Form shall be deemed to have been submitted when it is actually received by the Settlement Administrator.
- (e) The Settlement Administrator shall gather, review, prepare, and address the Payment Election Forms received pursuant to the Amended Stipulation of Settlement as follows:
  - (i) Payment Election Forms that have been properly submitted shall be designated as "Approved Forms." The Settlement Administrator shall examine the Payment Election Form before designating the Form as an Approved Form, to determine that the information on the Payment Election Form is reasonably

- complete and contains sufficient information to (if requested) enable the payment of the Class Member's Settlement Share to his or her PayPal Account or bank account via eCheck.
- (ii) No Class Member may submit more than one Payment Election Form. The Settlement Administrator shall identify any Payment Election Forms that appear on behalf of the same Class Member ("Duplicative Payment Election Forms"). The Settlement Administrator shall determine whether there is any duplication of Forms, if necessary by contacting the Class Member(s) or their counsel. The Settlement Administrator shall designate any such Duplicative Payment Election Forms as rejected.
  - (iii) The Settlement Administrator shall exercise, in its discretion, all usual and customary steps to prevent fraud and abuse and take any reasonable steps to prevent fraud and abuse in the election process. The Settlement Administrator may, in its discretion, deny in whole or in part any election to prevent actual or possible fraud or abuse.
  - (iv) By agreement, the Parties can instruct the Settlement Administrator to take whatever steps it deems appropriate to preserve the Settlement Fund to further the purposes of the Amended Stipulation of Settlement if the Settlement Administrator identifies actual or possible fraud or abuse relating to the submission of Payment Election Forms, including, but not limited to, rejecting a Payment Election Form to prevent actual or possible fraud or abuse.
  - (v) A Payment Election Form that is rejected, for any reason, will be deemed to have never been submitted.
- (f) The Settlement Administrator shall provide periodic reports to Class Counsel and Defense Counsel regarding the implementation of the Amended Stipulation of Settlement and this Protocol.
- (i) The Settlement Administrator may review timely submitted Payment Election Forms and approve or contest any of the forms.

- (ii) The Settlement Administrator's reduction or denial of a Payment Election Form is final, but the Parties and/or Class Members may submit any disputed issues to the Court or a referee appointed by the Court for summary and non-appealable resolution.

**4. Settlement Share Calculation**

- (a) The relief to be provided to eligible Class Members shall be as set forth in the Amended Stipulation of Settlement.
- (b) As specified in the Amended Stipulation of Settlement, the Settlement Administrator shall determine the amount of the Settlement Share, whether the Class Member submitted a valid, complete and timely Payment Election Form, and whether the Settlement Share will be paid to the Class Member's Uber Rider Account, PayPal Account, or bank account via eCheck.
- (c) As set forth in the Amended Stipulation of Settlement, the Settlement Administrator shall keep track of Uber's reports regarding distribution of the Settlement Share, make timely payments from the Settlement Fund to Uber, and maintain an index of Class Members who have used the Settlement Share either as a used payment to their Uber Rider Account or a payment to their PayPal Account or bank account via eCheck.

**5. Payments To PayPal Accounts and Bank Accounts By eCheck**

- (a) As specified in the Amended Stipulation of Settlement, the Settlement Administrator shall pay the Settlement Share to each Electing Class Member that opted for payment to his or her PayPal account or bank account via eCheck, if applicable.
- (b) For payment to a Class Member's PayPal account, the Settlement Administrator shall charge no more than three percent (3%) of the Settlement Share, with a minimum charge per transaction of \$.01 and a maximum charge per transaction of \$1.00 for domestic payments and \$20.00 for international payments.
- (c) For payment to a Class Member's bank account via eCheck, the Settlement Administrator shall charge no more than \$.24 for each payment.