

Certificate of Authenticity of Business Records



I, Jennifer Sullivan, certify that,

1. I am employed by Uber Technologies, Inc. (“Uber”) located in San Francisco, California. I am a duly authorized custodian of records for Uber and have authority to certify Uber’s domestic records of regularly conducted activity.
2. I have reviewed the business records produced on July 21, 2023, in response to the Subpoena served on Uber on June 6, 2023, and a separate Certificate of Authenticity of Business Records was included with that production. The records were those reasonably accessible to Uber and responsive to the legal process. Those records were prepared in the regular course of business or made and kept by Uber’s automated systems in the regular course of business. The records were made at or near the time of the act, condition, or event, as a regular business practice.
3. I have reviewed the Subpoena dated August 22, 2023, and served on Uber on August 23, 2023. I have conducted a reasonable and diligent search for records responsive to the requests in the Subpoena. I was unable to locate any additional records responsive to the requests.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Jennifer Sullivan
Signature _____

September 8, 2023
Date _____



UBER TECHNOLOGIES, INC.
1515 THIRD STREET
SAN FRANCISCO, CA 94158
UBER.COM

June 21, 2023

Via Email to: Erin.Epley_HC@house.texas.gov

Erin M. Epley, Esq.
Chief Committee Counsel and Committee Director
House Committee on General Investigating
105 West 15th Street
Austin, TX 78701

Re: Response to Subpoena from the State of Texas, House of Representatives

Dear Ms. Epley:

We write in response to the Subpoena (“Subpoena”) served on Uber Technologies, Inc. (“Uber”) on June 6, 2023, seeking the following pertaining to Natin (Nate) Paul and Warren Kenneth (Ken) Paxton:

- *“1. Subscriber information related to Natin (Nate) Paul of Austin, Texas including when the account originated, payment method and information, records including time, date, pickup location and dropoff location, dating from January 1, 2019 to December 31, 2020.”*
- *“2. Subscriber information related to Warren Kenneth (Ken) Paxton of Dallas or Austin, Texas including when the account originated, payment method and information records including time, date, pickup location and dropoff location, dating from January 1, 2019 to December 31, 2020. Need: email and cell phones to link to this request.”*

First, the Subpoena creates an undue burden on Uber by failing to provide the necessary identifying information for Mr. Paul or Mr. Paxton (the phone number and/or email address associated with the account). Additionally, the request is overbroad as to scope, unduly burdensome, and purports to seek documents that are not reasonably calculated to lead to the discovery of admissible evidence. Certain terms in the request are also vague and ambiguous (*e.g., payment method and information*).

Uber further objects to the request on the grounds that it imposes a significant and undue burden by seeking documents from non-party Uber. Rider receipts are available in-app and emailed after each trip. In addition, users have access to all of their information through the Download Your Data tool at <https://accounts.uber.com/privacy/downloadyourdata>.

The foregoing objections notwithstanding, based on our additional correspondence and telephone conversation wherein you provided identifying information and further context related to the Subpoena, we have conducted a reasonable and diligent search and were able to locate the following records responsive to your request:

1. *A trip history for completed trips taken between January 1, 2019 to December 31, 2020 on an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name "Dave P"*
2. *The payment methods on file for an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name "Dave P"*
3. *The signup information on file for an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name "Dave P"*
4. *A trip history for completed trips taken between January 1, 2019 to December 31, 2020 on an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name "Ken Paxton"*
5. *The payment methods on file for an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name "Ken Paxton"*
6. *The signup information on file for an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name "Ken Paxton"*

Please note, a Certificate of Authenticity of Records authenticating the above-referenced documents is attached hereto. Please feel free to contact me should you have any questions.

Sincerely,



Jennifer Sullivan
Sr. Paralegal, Litigation
jsullivan@uber.com

Certificate of Authenticity of Business Records

I, Jennifer Sullivan, certify that,

1. I am employed by Uber Technologies, Inc. (“Uber”) located in San Francisco, California. I am a duly authorized custodian of records for Uber and have authority to certify Uber’s domestic records of regularly conducted activity.

2. I have reviewed the business records produced in response to the Subpoena served on Uber on June 6, 2023 by the ***State of Texas, House of Representatives***. The records are those reasonably accessible to Uber and responsive to the legal process.
 1. *A trip history for completed trips taken between January 1, 2019 to December 31, 2020 on an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name “Dave P”*
 2. *The payment methods on file for an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name “Dave P”*
 3. *The signup information on file for an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name “Dave P”*
 4. *A trip history for completed trips taken between January 1, 2019 to December 31, 2020 on an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name “Ken Paxton”*
 5. *The payment methods on file for an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name “Ken Paxton”*
 6. *The signup information on file for an account matching the identifiers provided for Warren Kenneth (Ken) Paxton under the name “Ken Paxton”*

3. The records were prepared in the regular course of business or made and kept by Uber’s automated systems in the regular course of business. The records were made at or near the time of the act, condition, or event, as a regular business practice.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Jennifer Sullivan
Signature

June 21, 2023
Date

"Dave P" - Trip History

City	Status	Request Time	Pickup Time	Pickup Lat	Pickup Long	Dropoff Time	Dropoff Lat	Dropoff Long	Fare	Card Type	Card Brand	Card No.
Austin	completed	10/27/19 5:59 AM	10/27/19 6:09 AM	30.25	-97.8706949	10/27/19 6:21 AM	30.2702694	-97.7493609	19.14	\N	\N	\N
Austin	completed	11/24/19 4:51 AM	11/24/19 5:03 AM	30.25	-97.87056	11/24/19 5:20 AM	30.27042	-97.74933	17.81	\N	\N	\N
Los Angeles	completed	11/24/19 7:23 PM	11/24/19 7:47 PM	33.9429368	-118.4051579	11/24/19 8:08 PM	34.0659209	-118.410498	77.02	\N	\N	\N
Los Angeles	completed	11/25/19 12:08 PM	11/25/19 12:10 PM	34.06592	-118.41057	11/25/19 12:27 PM	34.054	-118.46343	31.98	\N	\N	\N
Los Angeles	completed	11/25/19 1:43 PM	11/25/19 1:45 PM	34.054	-118.46333	11/25/19 1:59 PM	34.06594	-118.41051	33.46	\N	\N	\N
Los Angeles	completed	11/26/19 2:06 PM	11/26/19 2:15 PM	34.0659906	-118.410505	11/26/19 3:10 PM	33.9423872	-118.4073114	88.25	\N	\N	\N
Austin	completed	12/8/19 3:36 AM	12/8/19 3:39 AM	30.27032	-97.74937	12/8/19 3:46 AM	30.26306	-97.74407	22.00	\N	\N	\N
Austin	completed	12/8/19 5:44 AM	12/8/19 6:16 AM	30.25	-97.8707618	12/8/19 6:27 AM	30.2166412	-97.7537343	15.88	\N	\N	\N
Las Vegas	completed	12/23/19 5:58 PM	12/23/19 6:04 PM	36.1288073	-115.1730589	12/23/19 6:18 PM	36.1145867	-115.1750949	23.05	\N	\N	\N
Chicago	completed	2/15/20 4:54 PM	2/15/20 5:04 PM	41.9789702	-87.9057395	2/15/20 5:48 PM	41.888886	-87.6271159	113.07	\N	\N	\N
Chicago	completed	2/15/20 9:45 PM	2/15/20 9:46 PM	41.88918	-87.62711	2/15/20 9:51 PM	41.89325	-87.62957	15.84	\N	\N	\N
Chicago	completed	2/16/20 1:03 AM	2/16/20 1:09 AM	41.89324	-87.63032	2/16/20 1:16 AM	41.88945	-87.62662	16.45	\N	\N	\N
Chicago	completed	2/16/20 1:42 AM	2/16/20 1:46 AM	41.8895116	-87.6272279	2/16/20 1:54 AM	41.8932684	-87.6302281	15.84	\N	\N	\N
Chicago	completed	2/16/20 2:02 AM	2/16/20 2:04 AM	41.89325	-87.62968	2/16/20 2:10 AM	41.88907	-87.62695	15.84	\N	\N	\N
Chicago	completed	2/16/20 5:33 PM	2/16/20 5:37 PM	41.88908	-87.62695	2/16/20 5:57 PM	41.87759	-87.66863	34.60	\N	\N	\N
Chicago	completed	2/16/20 6:33 PM	2/16/20 6:35 PM	41.8777095	-87.6686951	2/16/20 6:40 PM	41.880015	-87.6693163	17.84	\N	\N	\N
Chicago	completed	2/16/20 11:01 PM	2/16/20 11:17 PM	41.88159	-87.67132	2/16/20 11:31 PM	41.88877	-87.62684	43.49	DEBIT	VISA	5187
Chicago	completed	2/17/20 1:13 PM	2/17/20 1:16 PM	41.88932	-87.62675	2/17/20 2:01 PM	41.97823	-87.89911	77.50	DEBIT	VISA	5187
Austin	completed	7/30/20 6:42 PM	7/30/20 6:52 PM	30.25	-97.7597243	7/30/20 7:00 PM	30.2828	-97.7458151	20.98	DEBIT	VISA	5187
Austin	completed	7/31/20 10:47 AM	7/31/20 10:58 AM	30.271	-97.742299	7/31/20 11:01 AM	30.2829188	-97.7456852	15.00	DEBIT	VISA	5187
Austin	completed	7/31/20 11:57 AM	7/31/20 12:02 PM	30.282	-97.7455895	7/31/20 12:10 PM	30.2669917	-97.7498895	17.73	DEBIT	VISA	5187
Austin	completed	8/6/20 11:30 AM	8/6/20 11:40 AM	30.29	-97.75970397	8/6/20 11:55 AM	30.25623174	-97.8702951	41.47	DEBIT	VISA	5187
Austin	completed	8/8/20 8:37 AM	8/8/20 8:48 AM	30.25	-97.76027	8/8/20 9:05 AM	30.24994	-97.85905	38.75	DEBIT	VISA	5187
Austin	completed	8/9/20 5:29 PM	8/9/20 5:44 PM	30.2358348	-97.8393156	8/9/20 5:54 PM	30.26	-97.8698467	30.45	DEBIT	VISA	5187
Austin	completed	8/10/20 3:57 PM	8/10/20 4:05 PM	30.29	-97.75958779	8/10/20 4:19 PM	30.24905687	-97.85515574	39.52	DEBIT	VISA	5187
Austin	completed	8/18/20 11:33 AM	8/18/20 11:39 AM	30.25	-97.7604	8/18/20 11:50 AM	30.2492	-97.85569	36.89	DEBIT	VISA	5187
Austin	completed	8/27/20 12:33 PM	8/27/20 12:40 PM	30.27	-97.74260938	8/27/20 12:59 PM	30.24920265	-97.85574388	39.34	DEBIT	VISA	5187
Austin	completed	8/27/20 2:20 PM	8/27/20 2:28 PM	30.24964315	-97.85726943	8/27/20 2:45 PM	30.27434429	-97.74264434	28.79	DEBIT	VISA	5187
Austin	completed	8/31/20 8:51 PM	8/31/20 9:04 PM	30.24985	-97.85889	8/31/20 9:16 PM	30.29	-97.7595	45.65	DEBIT	VISA	5187
Austin	completed	8/31/20 10:03 PM	8/31/20 10:10 PM	30.29	-97.7606	8/31/20 10:23 PM	30.24914	-97.85499	27.53	DEBIT	VISA	5187
Austin	completed	9/3/20 6:43 PM	9/3/20 6:56 PM	30.29	-97.76038965	9/3/20 7:10 PM	30.2491122	-97.85570048	50.86	DEBIT	VISA	5187
Austin	completed	9/10/20 7:21 PM	9/10/20 7:24 PM	30.26	-97.74614402	9/10/20 7:41 PM	30.24904166	-97.8548223	38.69	DEBIT	VISA	5187

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City	Status	Request Time	Pickup Time	Pickup Lat	Pickup Long	Dropff Time	Dropoff Lat	Dropoff Long	Fare	Card Type	Card Brand	Card No.
Austin	completed	9/10/20 10:13 PM	9/10/20 10:20 PM	30.24913293	-97.85490848	9/10/20 10:34 PM	30.26573641	-97.74627196	13.12	DEBIT	VISA	5187
Austin	completed	9/14/20 6:01 PM	9/14/20 6:06 PM	30.29	-97.76022953	9/14/20 6:19 PM	30.24912502	-97.85537867	19.19	DEBIT	VISA	5187
Austin	completed	9/14/20 9:16 PM	9/14/20 9:30 PM	30.24912	-97.85492	9/14/20 9:44 PM	30.29	-97.76023	18.95	DEBIT	VISA	5187
Austin	completed	9/15/20 6:10 PM	9/15/20 6:17 PM	30.27439	-97.74276	9/15/20 6:20 PM	30.2829	-97.74565	15.00	DEBIT	VISA	5187
Austin	completed	9/20/20 7:32 PM	9/20/20 7:41 PM	30.27514983	-97.74218788	9/20/20 7:58 PM	30.24899337	-97.85460877	47.74	DEBIT	VISA	5187
Austin	completed	9/30/20 10:50 PM	9/30/20 10:57 PM	30.29	-97.76049	9/30/20 11:17 PM	30.26	-97.86989	40.43	DEBIT	VISA	5187
Austin	completed	10/1/20 6:03 PM	10/1/20 6:08 PM	30.29	-97.76035	10/1/20 6:28 PM	30.24914	-97.855	20.58	DEBIT	VISA	5187
Austin	completed	10/2/20 10:31 PM	10/2/20 10:39 PM	30.29	-97.76034	10/2/20 10:53 PM	30.24914	-97.85501	19.29	DEBIT	VISA	5187

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UBER_000002

"Dave P" - Payment Methods on File

Last Update	Create Time	Account	Bin No.	Card Issuing Bank	Billing Country (Zip)	Expiration Date
20 May 2023 09:14:09 pm UTC	28 Mar 2021 02:00:17 am UTC	<u>MASTERCARD - 0523</u>	518941	CITIBANK N.A. (United States)	United States (78735)	28 Feb 2026 11:59:59 pm UTC
19 May 2023 12:23:28 am UTC	26 Sep 2020 09:12:50 am UTC	<u>STORED_VALUE</u>	-	-	-	-
09 Apr 2023 04:41:20 am UTC	15 May 2022 07:31:01 pm UTC	<u>MASTERCARD - 1001</u>	545212	BARCLAYS BANK DELAWARE (United States)	United States (78735)	31 Dec 2024 11:59:59 pm UTC
07 Jun 2022 10:06:02 pm UTC	17 Oct 2021 01:20:38 am UTC	<u>VISA - 7203</u>	446542	Wells Fargo Bank, National Association (United States)	United States (78735)	30 Apr 2026 12:00:00 am UTC
29 Apr 2022 04:28:04 pm UTC	09 Nov 2020 10:37:42 pm UTC	<u>VISA - 5187</u>	490070	JPMorgan Chase Bank N.A. - Debit (United States)	United States (78701)	31 Jan 2025 12:00:00 am UTC
28 Mar 2021 01:58:28 am UTC	17 Nov 2020 10:02:22 pm UTC	<u>MASTERCARD - 8947</u>	545212	BARCLAYS BANK DELAWARE (United States)	United States (78735)	31 Dec 2024 12:00:00 am UTC
17 Nov 2020 09:31:45 pm UTC	25 Oct 2020 01:45:00 am UTC	<u>VISA - 7496</u>	434258	Wells Fargo Bank, National Association (United States)	United States (78735)	31 May 2024 12:00:00 am UTC
17 Nov 2020 09:50:24 am UTC	17 Nov 2020 02:33:38 am UTC	<u>AMERICAN EXPRESS - 9004</u>	371249	-	United States (78701)	30 Sep 2024 12:00:00 am UTC
09 Oct 2020 03:34:36 am UTC	09 Oct 2020 03:34:36 am UTC	<u>APPLE PAY DISPLAY</u>	-	-	-	-
17 Aug 2020 10:36:32 am UTC	28 Jul 2020 09:43:58 pm UTC	<u>NATEPAULTEXAS</u>	-	-	-	-

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UBER_000003

"Dave P" - Account Signup Information

Email Address	First Name	Last Name	Signup Time	Primary Role	Secondary Role	Mobile
nate@world-class.com	Dave	P	10/27/19 10:58 AM	rider	eater	8319

"Ken Paxton" - Trip History

City	Status	Request Time	Pickup Time	Pickup Lat	Pickup Long	Dropoff Time	Dropoff Lat	Dropoff Long	Fare	Card Type	Card Brand	Card No.
Lincoln	completed	6/16/19 7:06 AM	6/16/19 7:26 AM	40.73728	-96.76285	6/16/19 8:43 AM	41.30051	-95.89971	119.86	CREDIT	VISA	5360

"Ken Paxton" - Payment Methods on File

Last Update	Create Time	Account	Bin No.	Card Issuing Bank	Billing Country (Zip)	Expiration Date
19 Nov 2020 12:41:02 am UTC	19 Nov 2020 12:41:02 am UTC	<u>VISA - 5360</u>	414720	Chase Bank USA, National Association (United States)	United States (75071)	01 Jul 2024 12:00:00 am UTC
26 Sep 2020 12:54:23 pm UTC	26 Sep 2020 12:54:23 pm UTC	<u>STORED VALUE</u>	-	-	-	-

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UBER_000006

HBOM00030251

"Ken Paxton" - Account Signup Information

Email Address	First Name	Last Name	Signup Time	Primary Role	Secondary Role	Mobile
ken@kenpaxtonlaw.com	Ken	Paxton	11/9/17 10:20 PM	rider	eater	██████████ 8128

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UBER_000007

HBOM00030252