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March 29, 2016

VIA FIRST CLASS MAIL AND ELECTRONIC MAIL ([craig.clark@uber.com](mailto:craig.clark@uber.com))

Craig Clark  
Uber Legal Department  
1455 Market Street  
San Francisco, CA 94103

Re: *Morgan Richardson*

Dear Mr. Clark:

I represent Ms. Morgan Richardson. She worked for Uber from November 3, 2014 through November 2, 2015. She was based in Portland, Oregon.

You called Ms. Richardson on March 4, 2016. You asked her a series of questions regarding information published in the media regarding sexual assault and rape suffered by consumers of Uber rides. Ms. Richardson ended the conversation with you once you began to accuse her of taking certain screen shots and giving them to the media. You asked for names of Uber associated individuals who she knew were talking to the media. She refused to do that. You asked to look at her computer and she refused as well.

On March 6, 2016 you emailed Ms. Richardson accusing her of sharing information with the media regarding sexual assault and rape suffered by Uber consumers. You demanded Ms. Richardson inform you regarding any information she had collected and disclosed and that she identify anyone to whom she had disclosed such information. You further insisted that she preserve all communication with others regarding the sharing of this information.

On March 25, 2016, at 7:30 in the morning, a male individual showed up at Ms. Richardson's apartment and began banging on her door. He kept on banging on the door for approximately 5 minutes. Ms. Richardson was startled by this person at her door and looked out the peephole. She saw him opening her mailbox and looking inside it. She saw him place his ear against her door apparently to hear her inside. With much apprehension she opened the door just to get him to stop pounding. He identified himself as an Uber investigator from California. He did not show her any identification. I am assuming you gave him Ms. Richardson's private address information and told him to go to her apartment unannounced. He said, "I'm from Uber and I want to talk to you." Ms. Richardson said she did not want to talk to him but he persisted. He said, "Do you want to put that in writing?" She said, "No, I do not." He

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persisted, so to get rid of him Ms. Richardson finally relented and agreed to put in writing that she did not want to talk to him. During this conversation, the investigator asked if he could come into her apartment and she refused. Despite this refusal, he walked into her apartment while she was getting a pen. This clearly constituted trespass and frightened Ms. Richardson since she had just refused him entrance. The Uber investigator, sent from California to intimidate Ms. Richardson, put his briefcase on the sofa and took out a legal pad for Ms. Richardson to write on. She wrote that she did not want to talk to him and then he said, "You know what this is about don't you?" She replied that she thought she did. At one point he asked ominously, "Do I scare you?" Then he said to her, "THIS IS NOT GOING TO GO AWAY YOU KNOW."

Ms. Richardson felt deeply scared and intimidated by the actions, words and threats of this investigator—a visit presumably instigated and sanctioned by you.

It is apparent that Uber's goal is to intimidate Ms. Richardson and prevent her from sharing information with the press or with law enforcement about criminal behavior committed by Uber representatives. Your attempts to muzzle her and prevent her from speaking are a gross violation of her right and duty to report any illegal and criminal behavior of Uber drivers.

You are hereby instructed to cease and desist any further communication or contact with Ms. Richardson. You are instructed to stop the intimidation. If you have anything to communicate to her, you may do so through me.

Any further contact by Uber employees, management, legal representatives or investigators with Ms. Richardson will lead her to pursue all the legal remedies available to stop and redress such behavior.

Sincerely,  
DOLAN LAW GROUP PC



Martin C. Dolan

MCD/arl

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