

# Exhibit 1

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**From:** Minna Chan <mchan@raklaw.com>  
**Sent:** Monday, May 2, 2022 9:56 AM  
**To:** SvKCRD@cand.uscourts.gov  
**Cc:** AGIS; agis@raklaw.com; Taylor, Jeremy; Salpietra, Bethany; DL Lyft AGIS  
**Subject:** 5:21-cv-04653-BLF | Lyft, Inc. v. AGIS Software Development LLC

[EXTERNAL EMAIL]

Good morning Madam Clerk,

AGIS Software respectfully submits that, to resolve the dispute regarding P.L.R. 3-2, AGIS Software will produce the EDTX P.R. 3-2 production as requested by Lyft in its briefing and during Friday's hearing. For background, the parties discussed two parts to Lyft's request for P.L.R. 3-2. First, AGIS Software agreed to produce all settlement agreements on a rolling basis after notice clearances. Second, Lyft's briefing submitted that P.L.R. 3-2(a)-(c) is coextensive with EDTX P.R. 3-2 and that AGIS Software should produce the same 3-2 documents in this case notwithstanding that they are AGIS, Inc. documents. Dkt. 88 at 2-3. The Court made clear during the hearing that it viewed the prior litigation productions under 3-2 as separate and unique from the issue of whether AGIS Software generally has possession, custody, and control over AGIS, Inc. documents, which it does not. In an effort to resolve the outstanding dispute regarding the prior EDTX P.R. 3-2 production, AGIS Software has informed Lyft that it will produce the entirety of the EDTX P.R. 3-2 production, including the AGIS, Inc. documents which were produced in EDTX under voluntary cooperation prior to issuance of a subpoena. Accordingly, AGIS believes that this resolution moots the dispute and obviates the need for the supplemental briefing due today at noon. AGIS expect to make the production to Lyft within the next couple of hours.

We have also copied Lyft's counsel to this email thread.

Regards,

Minna Chan  
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