

Exhibit 4

1 Q Does Lyft have locations elsewhere in Texas?

2 A Elsewhere in Texas. Sorry. Yes, we do. We have four
3 offices. One in Irving. One in Houston. One in Austin. And
4 one in San Antonio.

02:02PM 5 Q And just to reiterate, none of those locations are in
6 the Eastern District of Texas; correct?

7 A That's correct.

8 Q And all of the information that you gave about Lyft,
9 presence or lack thereof in the Eastern District of Texas,
02:02PM 10 that's true of today; is that correct?

11 A That's correct.

12 Q Is it true from January 2021 through today?

13 A It is. We had another site earlier this year in Euless,
14 Texas, which is not in the Eastern District.

02:02PM 15 Q There's been a lot of talk, you are heard us talking
16 about an Express Drive location in Plano, Texas; specifically,
17 at 928 West Spring Creek Parkway. Are you familiar with this
18 location?

19 A I am.

02:03PM 20 Q Is that location -- or is that address, rather, in the
21 Eastern District of Texas?

22 A It is.

23 Q And at that address is the location of a Pep Boys store;
24 is that correct?

02:03PM 25 A That's correct.

1 Q And at some point in the past Lyft operated an Express
2 Drive location inside that Pep Boys store; correct?

3 A That's correct.

4 Q What did Lyft use the Express Drive location for in
02:03PM 5 Plano?

6 A That location was used to facilitate the rental program
7 with Hertz primarily.

8 Q And there were Lyft employees there to facility the
9 rental program with Hertz; correct?

02:03PM 10 A That's correct. One to two employees.

11 Q Is that Plano Express Drive location currently
12 operating?

13 A No, it is not.

14 Q And, roughly, when did the Plano Express Drive location
02:03PM 15 cease operations?

16 A In August of 2019.

17 Q And we heard some discussion earlier about the exact
18 day. It's fair to say you don't know exactly which day in
19 August it closed, but you know it closed in August; correct?

02:04PM 20 A That's correct. It would have been around that
21 timeframe, that's correct.

22 Q Why did it close?

23 A I do not know the specific reason for that exact site.
24 But I know, generally, these type of sites come and go for
02:04PM 25 various reasons. Some of these reasons could be just overall

1 relations with the company at a nation level. Some,
2 operationally, constraints could develop. So for, you know,
3 example, it just doesn't make sense operationally. There are
4 better sites or just less visitors. There's various reasons
02:04PM 5 that could cause a site to open or close.

6 Q Stepping back and looking at all of the Eastern District
7 of Texas, does Lyft have any Express Drive locations currently
8 in the Eastern District of Texas?

9 A No, we do not.

02:04PM 10 Q Again, from January 2021, when this lawsuit was filed
11 until today, has Lyft had any Express Drive locations in the
12 Eastern District of Texas?

13 A We have not.

14 Q In fact, as you testified earlier, Lyft doesn't have any
02:05PM 15 offices or locations in the Eastern District of Texas; is that
16 correct?

17 A That's correct.

18 MR. RUBINO: Objection. Leading.

19 BY MR. TAYLOR:

02:05PM 20 Q Does Lyft have users in the Eastern District of Texas?

21 A Yes. If you refer to users, for example, riders on the
22 platform, yes.

23 Q Riders and drivers; right? Both can use Lyft's
24 application; correct?

02:05PM 25 A That's correct.

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