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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

12 Uber Technologies, Inc.,
13 Plaintiff,
14 v.
15 John Doe I, an individual,
16 Defendant.

Case No.

COMPLAINT FOR:

**(1) VIOLATION OF THE COMPUTER
FRAUD AND ABUSE ACT, 18 U.S.C. §1030,
et seq.; AND
(2) VIOLATION OF CALIFORNIA
COMPREHENSIVE COMPUTER DATA
ACCESS AND FRAUD ACT,
CALIFORNIA PENAL CODE § 502**

[DEMAND FOR JURY TRIAL]

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1 For its complaint, plaintiff Uber Technologies, Inc. (“Uber”) alleges as follows:

2 **I. PARTIES**

3 1. Plaintiff Uber is a Delaware corporation with its principal place of business in San
4 Francisco, California.

5 2. Defendant John Doe I is an individual of unknown residence and citizenship.
6 Uber does not know John Doe I’s identity or location at this time. Uber will amend its complaint
7 to name John Doe I when his or her identity is learned.

8 **II. JURISDICTION AND VENUE**

9 3. This Court has federal question jurisdiction over this action under 28 U.S.C.
10 § 1331, because this action alleges violations of the Computer Fraud and Abuse Act, 18 U.S.C.
11 § 1030.

12 4. Venue is proper in this District under 28 U.S.C. § 1391(b)(2). Depending on the
13 residence of defendants, venue may be proper under 28 U.S.C. § 1391(b)(1) or (3) as well.

14 **III. FACTS AND BACKGROUND**

15 5. Uber is a technology company that has developed a smartphone application that
16 connects drivers and riders in cities all over the world. Uber publicly launched in June 2010, and
17 is available in over 200 cities. Over 100,000 drivers use Uber’s smartphone app to receive
18 requests for transportation services.

19 6. Uber maintains internal database files with confidential details on the drivers who
20 use its application.

21 7. The contents of these internal database files are closely guarded by Uber.
22 Accessing them from Uber’s protected computers requires a unique security key that is not
23 intended to be available to anyone other than certain Uber employees, and no one outside of Uber
24 is authorized to access the files.

25 8. On or around May 12, 2014, from an IP address not associated with an Uber
26 employee and otherwise unknown to Uber, John Doe I used the unique security key to download
27 Uber database files containing confidential and proprietary information from Uber’s protected
28 computers.

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VII. PRAYER FOR RELIEF

WHEREFORE, plaintiff Uber prays for the following relief:

A. For injunctive relief, as follows: An order barring defendant from any further acts constituting violations of the Computer Fraud and Abuse Act and Section 502 of the California Penal Code, including any attempts to access files from Uber’s database or any attempts to transfer such files to any other person or entity, and directing defendants immediately to return to Uber any files or information described herein;

B. For judgment in favor of plaintiff, and against defendant, for damages in such amounts as may be proven at trial;

C. For reasonable attorneys’ fees; and

D. For such other relief as the Court may deem just and proper.

DATED: February 27, 2015

PERKINS COIE LLP

By: /s/ James G. Snell
James G. Snell

Attorneys for Plaintiff
Uber Technologies, Inc.