

# "Pressure to catch up 7 years" to Google

9/18/15



John Bares  
Uber Engineering Manager

- Bares' September 18, [2015] notes

## 18 Sept BAM Telecon

functional lead role seems to be constantly under threat  
need to get into a cadence of weekly recruiting updates to leads list  
with some reflection. Participants get some work and stick to it. Too much chaos. Must make uncalibrated decisions about status for instance.

### Rush to laser

team really strained on trying to figure out best sensor set while also keeping up progress on so many other fronts

### My strain

Uber bureaucracy setting in (HR, Recruiting, IT)

Building budget with no bounds, worried about losing our culture; but need to move on

Increasing pressure to catch up 7 years and deploy 100K cars in 2020. Every pull back seems to reflect poorly on me.



TX-0367, Page 1 of 62



WAYMO

TX 367

WDX1-15

# Uber Was Unable to Close the "Huge Gap" with Google in Driverless Car Technology

5/13/16

Message  
From: Jeff Holden [jh@uber.com]  
Sent: 5/13/2016 3:38:03 PM  
To: Travis Kalanick [travis@uber.com]  
Subject: Fwd: Zoom: Mobileye Sync

Here's the n

----- For  
From: Jeff Holden [jh@uber.com]  
Date: Fri, May 13, 2016 at 3:38 PM  
Subject: Re: Mobileye Sync  
To: Drew Bagnall [dbagnall@uber.com]

Hey again,

I'm reflecting  
call later an

Let me start  
trying to get  
second S cu  
extremes co  
Stepping va  
energy on fl

In that light  
this is all in  
CV side so  
down on an

- We
- The
- Dec
- beac
- The
- mas
- We
- For

**From:** Jeff Holden [jh@uber.com]  
**Sent:** 5/13/2016 3:38:03 PM  
**To:** Travis Kalanick [travis@uber.com]  
**Subject:** Fwd: Zoom: Mobileye Sync

Here's the note to Drew I mentioned in my previous email to you.

\* \* \*

- I'm **\*definitely\*** open to delaying that, but my worry is just the capability gap - we started from a **huge gap with G**, and I think we've all been sobered by how hard it is to close that gap, even with exceptional effort. I worry that if we allow another such gap to open, we'll find ourselves seriously compromised down the road.

lights). (Drew, if you want to make that argument, I'm totally down to discuss it, but I've been under the belief that you agree on this point.)

- Mobile Eye introduces a twist here in that we can theoretically incorporate it into our system in

- We should **\*not\*** have CV in the critical path; **we should double down on laser** (which means refocusing the current team on laser).

# Kalanick Contacts Levandowski to Discuss "Selling a Non-Existent Company"

October 2015

## MEMORDANUM

**MEMORDANUM**  
To: John Gardner  
From: Stroz Friedberg  
Date: April 2, 2016  
Re: DRAFT Summary Interview of Anthony Levandowski

On March 22 and 23, 2016, Mary Fulginiti, Melanie Maugeri, and Hanley Chew interviewed Anthony Levandowski at the offices of Stroz Friedberg on 101 Montgomery Street, Suite 2200, San Francisco, California 94104. On April 1, 2016, Mary Fulginiti and Hanley Chew conducted a follow-up interview of Levandowski via telephone.

### Employment at Google

Anthony stated that he began working for Google on April 9, 2007 when Google acquired Vutool, a company founded by Levandowski. [Multiple Names Redacted], which specialized in mapping technology. Following the acquisition, all of the founders joined Google. Vutool became Google's Street View Project, which is a technology that provides a panoramic view of streets for Google Maps and other apps.

### Employment Documents and Training

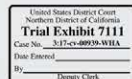
When Levandowski joined Google, he signed an invention, nondisclosure, non-solicitation, and other things. Levandowski understood these provisions as Google's "secrets," and from approaching Google longer working at Google. He also recalled that with Google provided they did not relate to Google provided training on how to handle queries regarding confidentiality or non-solicitation. [Redacted] Will Employment, Confidential Information, in which was attached to a February 1, 2016 letter reviewed said letter and agreement and confidential said documents. They are attached hereto as [Redacted]

At the time that he started working for Google Software Engineer on the Street View Project, [Redacted] was his supervisor. Levandowski's From 2008 through 2009, Levandowski worked aerial imagery collection. In 2008, he also set up operations in Mountain View and India to help

In October 2015, Kalanick contacted Levandowski directly. They met and discussed robot cars. Kalanick indicated that Uber did not want to be a customer and instead wanted to be more involved in Levandowski's new venture. Kalanick talked to Levandowski about buying the robot vehicle technology. Levandowski and Ron went to Uber after this meeting and discussed selling a non-existent company. Poetscher and McClendon were present at this meeting. It was at this point that Levandowski first seriously considered leaving Google.<sup>4</sup>

To: John Gardner  
From: Stroz Friedberg  
Date: April 2, 2016  
Re: DRAFT Summary Interview of Anthony Levandowski

1



CONFIDENTIAL

UBER00312509

TX-7111, Page 1 of 37



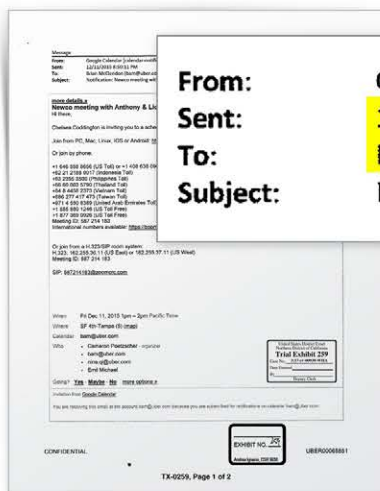
WAYMO

TX 7111

WDX1-18

# Levandowski Downloads 14,000 Waymo Proprietary Files The Same Day He Meets with Uber

12/11/15



**From:** Google Calendar [calendar-notification@google.com]  
**Sent:** 12/11/2015 8:50:11 PM  
**To:** Brian McClendon [bam@uber.com]  
**Subject:** Notification: Newco meeting with Anthony & Lior (confirmed) @ Fri Dec 11, 2015 1pm - 2pm (bam@uber.com)

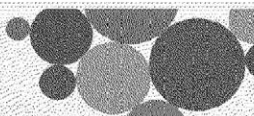
**When** Fri Dec 11, 2015 1pm – 2pm Pacific Time  
**Where** SF 4th-Tampa (5) ([map](#))  
**Calendar** bam@uber.com  
**Who**

- Cameron Poetzscher - organizer
- bam@uber.com
- nina.qi@uber.com
- Emil Michael



**MACHINE FORENSIC RECORD**  
SEM/217559  
**ATTORNEY CLIENT PRIVILEGE**

Google Security Team  
Incident Tracking



**anthonyl0-w**

\* \* \*

- 2015-12-11, TortoiseSVN was installed, and 14k+ files were downloaded from Waymo's SVN.



WAYMO

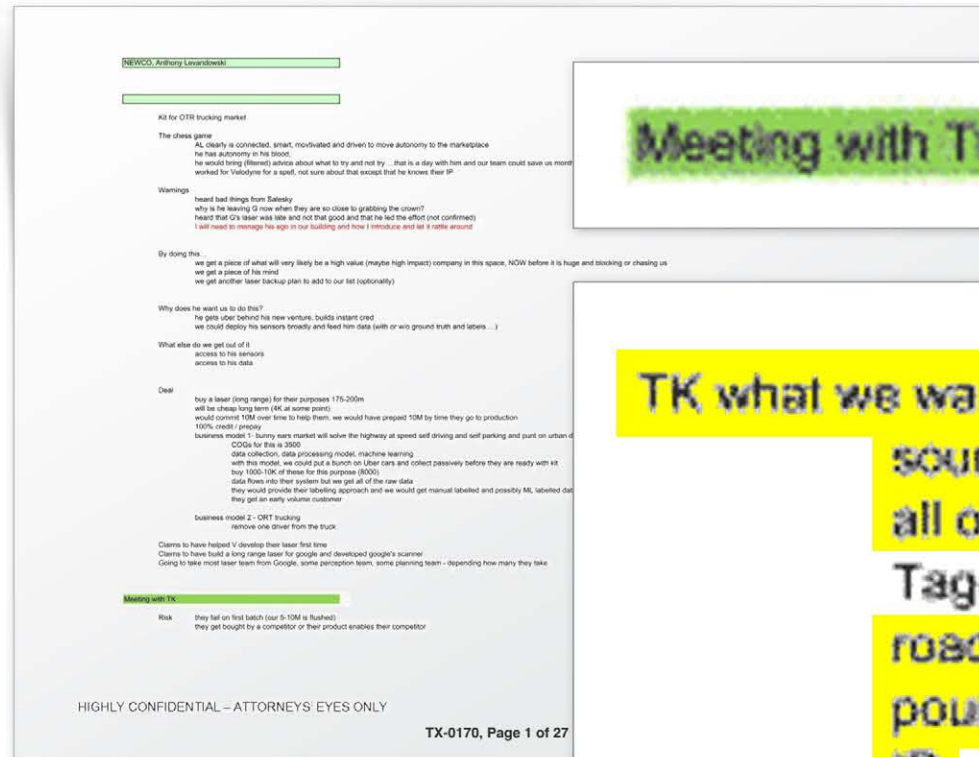
TX 259; TX 2260

WDX1-20

# Kalanick Wants "IP" and "Pound of Flesh" as Part of Newco Deal

12/22/15

- Bares' notes of December 22, 2015 meeting with Kalanick



Meeting with TK

TK what we want

source

all of their data

Tagging

road map

pound of flesh

IP



WAYMO

TX 170

WDX1-23

# Uber's Notes from the Jan. 3 Meeting With Levandowski: "Laser is the Sauce", "AL Laser" is "Critical to AV Success - No Clear Substitute"

1/3/16

Message  
From: Jeff Holden (via Google Docs) [drive-shares-noreply@google.com]  
Sent: 1/5/2016 12:37:32 AM  
To: tr@uber.com  
CC: bam@uber.com; cameron@uber.com  
Subject: NewCo Plan - Invitation to edit

Jeff Holden has invited you to edit the following document:  
NewCo Plan



1/5/2016 12:37:32 AM I started to capture state on the NewCo discussions.

Check out the document.

Google Docs. Check out edit documents online.

## Message

**From:** Jeff Holden (via Google Docs) [drive-shares-noreply@google.com]  
**Sent:** 1/5/2016 12:37:32 AM  
**To:** travis@uber.com  
**CC:** bam@uber.com; cameron@uber.com  
**Subject:** NewCo Plan - Invitation to edit

## Context

- Plan is to pull Anthony and team into Uber instead of working with them as a separate company.

## Possible Outcomes

- Super Duper (Uber Super Duper or USD, so could code name "\$")

- Laser is the sauce (AL laser ends up being critical to AV success - no clear substitute)

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TX-0262, Page 1 of 1



Possible Outcomes

- Super Duper (Uber Super Duper)
- Super
- Okay
- Meh
- Abject Failure

Conceptually, we could We discussed and (inc situation, that SD might reward for a medication)

Key outputs:

- % of autonomous market share
- % of Uber trips that are autonomous
- % of total market that is autonomous
- Set annual goals starting in 2017, interesting on this front
- Trucking would have its own 6
- Attribution to AL and team
  - Running the stack - software/spectrum ends up being critical to AV success - no clear substitute
  - Data generated/used (data that AL generates ends up being critical to AV success - no clear substitute)
  - Laser is the sauce (AL laser is clear substitute)
  - Each of these also has a spec - might end up being a solution

Inputs:

- Data
  - # of miles / units
  - Coverage / geo

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

TX-4174, Page 2 of 5

UBER00311284



WAYMO

TX 262; 4174

WDX1-24

# Levandowski Accesses Google Proprietary Information Hours Before Meeting with Uber

1/4/16



On Mon, Jan 4, 2016 at 1:19 PM, Jeff Holden <jeffh@uber.com> wrote:

**more details »**

**NewCo meeting w/Anthony**

When Mon Jan 4, 2016 5pm – 6:30pm Pacific Time

Where SFO | 1455 Market - 05th The Street (12) (map)

Calendar [bam@uber.com](mailto:bam@uber.com)

Who

- Jeff Holden - organizer
- Travis Kalanick
- [bam@uber.com](mailto:bam@uber.com)

Exhibit B to Supplemental Report of Lambertus Hesselink, Ph.D.

1	2	3	4	5	6	7	8	9	10	11	12	13
Index Key	Index Key	Index Key	Index Key	Index Key	Index Key	Index Key	Index Key	Index Key	Index Key	Index Key	Index Key	Index Key
1	STROZ_R_000135819	STROZ_R_000135819	STROZ_R_000135819	STROZ_R_000135819	STROZ_R_000135819	STROZ_R_000135819	STROZ_R_000135819	STROZ_R_000135819	STROZ_R_000135819	STROZ_R_000135819	STROZ_R_000135819	STROZ_R_000135819
2	STROZ_R_000140398	STROZ_R_000140398	STROZ_R_000140398	STROZ_R_000140398	STROZ_R_000140398	STROZ_R_000140398	STROZ_R_000140398	STROZ_R_000140398	STROZ_R_000140398	STROZ_R_000140398	STROZ_R_000140398	STROZ_R_000140398
3	STROZ_R_000149315	STROZ_R_000149315	STROZ_R_000149315	STROZ_R_000149315	STROZ_R_000149315	STROZ_R_000149315	STROZ_R_000149315	STROZ_R_000149315	STROZ_R_000149315	STROZ_R_000149315	STROZ_R_000149315	STROZ_R_000149315
4	STROZ_R_000155689	STROZ_R_000155689	STROZ_R_000155689	STROZ_R_000155689	STROZ_R_000155689	STROZ_R_000155689	STROZ_R_000155689	STROZ_R_000155689	STROZ_R_000155689	STROZ_R_000155689	STROZ_R_000155689	STROZ_R_000155689
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6	STROZ_R_000165297	STROZ_R_000165297	STROZ_R_000165297	STROZ_R_000165297	STROZ_R_000165297	STROZ_R_000165297	STROZ_R_000165297	STROZ_R_000165297	STROZ_R_000165297	STROZ_R_000165297	STROZ_R_000165297	STROZ_R_000165297
7	STROZ_R_000178823	STROZ_R_000178823	STROZ_R_000178823	STROZ_R_000178823	STROZ_R_000178823	STROZ_R_000178823	STROZ_R_000178823	STROZ_R_000178823	STROZ_R_000178823	STROZ_R_000178823	STROZ_R_000178823	STROZ_R_000178823

Exhibit B to Supplemental Report of Lambertus Hesselink, Ph.D.

	A	B	G	CB
1	Bates Beg	Bates End	Subject/Title	File System Last Accessed DateTime
2	STROZ_R_000135819	STROZ_R_000135819	KBr Assembly Procedure.PDF	7/11/2015 0:40
3	STROZ_R_000140398	STROZ_R_000140398	BBR update.PDF	7/8/2015 14:19
4	STROZ_R_000149315	STROZ_R_000149315	Sensing Brainstorms - Motivating Cases and Implications.XLSX	1/4/2016 12:21
5	STROZ_R_000155689	STROZ_R_000155689	Google Fiber Laser for Lidar.PDF	3/2/2016 16:30
6	STROZ_R_000155697	STROZ_R_000155697	BBR_PDR_Presentation.PDF	3/2/2016 16:30

**Sensing Brainstorms - Motivating Cases and Implications.XLSX** 1/4/2016 12:21

12	STROZ_R_000165297	STROZ_R_000165297	DFB Fitel wavelength bandwidth.PDF	9/21/2015 20:53
13	STROZ_R_000178823	STROZ_R_000178841	Full Throttle	3/8/2016 0:52



# Levandowski Again Downloads Numerous Waymo Proprietary Files the Same Day He Meets with Uber

1/4/16



On Mon, Jan 4, 2016 at 1:19 PM, Jeff Holden <jeffh@uber.com> wrote:

[more details »](#)

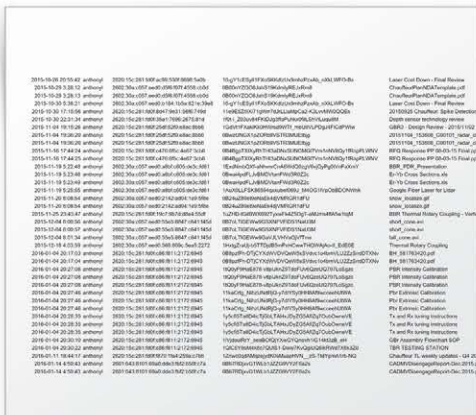
## NewCo meeting w/Anthony

When **Mon Jan 4, 2016 5pm – 6:30pm Pacific Time**

Where **SFO | 1455 Market - 05th The Street (12) ([map](#))**

Calendar [bam@uber.com](#)

- Who
- Jeff Holden - organizer
  - **Travis Kalanick**
  - [bam@uber.com](#)



		AL			
		A	B	E	
25	1/4/2016 8:27:08 PM	anthonyl			PBR Intensity Calibration
28	1/4/2016 8:27:46 PM	anthonyl			Pbr Extrinsic Calibration
31	1/4/2016 8:28:35 PM	anthonyl			Tx and Rx tuning Instructions
34	1/4/2016 8:30:10 PM	anthonyl			Gbr Assembly Flowchart SOP
35	1/4/2016 8:30:22 PM	anthonyl			TBR TESTING STATION





# Levandowski Again Downloads Highly Confidential Waymo Information on the Same Day He Meets with Uber

1/12/16

From: Cameron Poetzscher [cameron@uber.com]  
 Sent: 1/12/2016 8:18:13 PM  
 To: Emil Michael [emil@uber.com]; Jeff Holden [jeffh@uber.com]; Brian McClendon [bam@uber.com]  
 Subject: Newco

**From:** Cameron Poetzscher [cameron@uber.com]  
**Sent:** 1/12/2016 8:18:13 PM  
**To:** Emil Michael [emil@uber.com]; Jeff Holden [jeffh@uber.com]; Brian McClendon [bam@uber.com]  
**CC:** Nina Qi [nina.qi@uber.com]  
**Subject:** Newco

Sounds like Jeff/BAM/Bares convo with AL went well; I'll let Jeff or BAM post further.

CONFIDENTIAL  
 TX-0394, Page 1 of 2

		AL			
		A	B	E	
36	2016-01-11 18:44:17		anthonyl	Chauffeur TL weekly updates - Q4 2015	



# Bares' Meeting with Levandowski to Discuss His "Dream Case Long Range Laser"

1/12/16

From: Scott Boehmke [mailto:scott.boehmke@uberatc.com]  
Sent: Tuesday, January 12, 2016 6:22 PM  
To: John Bares  
Subject: RE: Laser dream (time critical)

Glad t  
Thinki  
grows  
we're  
missed  
straight  
try to  
12 deg  
Then t  
Likewi  
Anythi  
10cm  
points  
In sho  
like a  
not st  
S  
From:  
Sent:  
To: Sc  
Subje  
Hi Sco

**From:** John Bares [mailto:bares@uberatc.com]  
**Sent:** Tuesday, January 12, 2016 8:09 PM  
**To:** Scott Boehmke <scott.boehmke@uberatc.com>  
**Subject:** Laser dream (time critical)

Hi Scott-

I am in SF working something that I can't talk about (wonderful, huh).

I am trying to SWAG a dream case long range laser. This laser would have ability to put a patch of points in a "aimable"

Can you give me comments on all these numbers. Really want to hear your input. But this is DREAMLAND—meaning what would we really want if we could get it.

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UBER00018075

TX-0459, Page 2 of 3



WAYMO

TX 459

WDX1-28

# "TK's Advice On Legal: Tell Them We Are Going To Do It, Ask How To Minimize Risk, Minimize Pain"

1/21/16

- Bares' notes from January 21 meeting at Uber

20 Jan Meeting: Lior, AL, BAM, Cam, JH

Non-Solicit

nothing prior to depart

IP

they will resp to us that they will not violate patents

Employees

Issues to cover

tracking carve out plan, need to hear more  
how did they get to their 1%  
non-solicit  
IP 3rd party law firm  
script for the employees

21 Jan Meeting: TK, Emil, Cam, Bam (no Holden - on plane)

starts off with the premise of the deal -> JB and BAM make the case

BAM believes that laser will be critically strategic AND will provide the best safety case for us or at least very strong component of safety case

TK's advice on legal: tell them we are going to do it, ask how to minimize risk, minimize pain

change in payment structure  
change pain payment, hitting in about July—somehow this is a factor (second payment is set upon valuation of the project)  
(partner's dilemma)

Trying to "touch" all 55 by end of weekend  
they seem to have 11 already

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TX-0170, Page 11 of 27

UBER00060331



WAYMO

TX 170

WDX1-29

# The "X factor" for Uber Was That Levandowski And His Team "Has IP In Their Heads"

1/25/16

Message

From: John Bares [bares@uberatc.com]  
Sent: 1/25/2016 10:25:19 PM  
To: Cameron Poetzscher [cameron@uber.com]  
CC: Travis Kalanick [travis@uber.com]; Emil Michael [emil@uber.com]; Jeff Holden [jh@uber.com]  
Subject: Newco Equity Calculator (CLOSE HOLD)  
Attachments: Equity\_Calculator\_NEWCO\_v1.xlsx

Message

**From:** John Bares [bares@uberatc.com]  
**Sent:** 1/25/2016 10:25:19 PM  
**To:** Cameron Poetzscher [cameron@uber.com]  
**CC:** Travis Kalanick [travis@uber.com]; Emil Michael [emil@uber.com]; Jeff Holden [jh@uber.com]

One last thought. Let's assume all of Joe's RSUs are milestone-based. Once Joe has come to Uber, what if we want him to work on something else unrelated to the milestones... He may have a commission, be hunted, etc. Another possible

- 1) In the beige box is the rough RSUs that we would give to strong engineer hires today. With the exception of Anthony who would probably be higher than this scale, my sense is that each of his team would fit into one of these three buckets. Now of course the X factor is that with NEWCO we get a team that knows each other, has IP in their heads, has solved our problem before, etc.

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United States District Court  
Northern District of California  
Trial Exhibit 273  
Case No. 3:17-cv-00939-WHA  
Date Entered  
By: Deputy Clerk

UBER00071530

TX-0273, Page 1 of 1



WAYMO

TX 273

WDX1-30

# Levandowski to Kalanick: "we need to win, second place is first loser"

3/1/16

From: +14159177535 Travis Kalanick  
Participants: +15109196668 Anthony Levandowski  
+14159177535 Travis Kalanick

Source: iMessage: +15109196668

From: [REDACTED] Anthony Levandowski

Participants: [REDACTED] Anthony Levandowski  
[REDACTED] Travis Kalanick

Source: iMessage: [REDACTED]

Start Time: 2/13/2016 8:39:09 PM(UTC+0)

Last Activity: 3/21/2016 11:00:56 PM(UTC+0)

Time Stamp: 3/1/2016 9:02:59 AM(UTC+0)

I just see this as a race and we need to win, second place is first loser

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LEV\_002075

TX-10275, Page 1 of 34



WAYMO

TX 10275

WDX1-33

# Levandowski to Kalanick: "take all the shortcuts we can find"

3/1/16

From: +15109196668 Anthony Levandowski  
Participants: +15109196668 Anthony Levandowski  
+14159177535 Travis Kalanick

Source: iMessage: +15109196668  
Start Time: 2/13/2016 8:39:09 PM(UTC+0)  
Last Activity: 3/21/2016 11:00:56 PM(UTC+0)

Time Stamp: 3/1/2016 9:03:24 AM(UTC+0)

We do need to think though the strategy to take all the shortcuts we can find

From: [REDACTED] Anthony Levandowski

Participants: [REDACTED] Anthony Levandowski

[REDACTED] Travis Kalanick

Source: iMessage: [REDACTED]

Start Time: 2/13/2016 8:39:09 PM(UTC+0)

Last Activity: 3/21/2016 11:00:56 PM(UTC+0)

Time Stamp: 3/1/2016 9:03:24 AM(UTC+0)

We do need to think though the strategy to take all the shortcuts we can find

CON

TX-5460, Page 1 of 1



WAYMO

TX 5460

WDX1-34

# "TK – This is all about winning" and "losing is not an option"

3/13/16

From: +16502246201 Lior Ron  
Participants: +15109196668 Anthony Levandowski (owner)  
+16502246201 Lior Ron

Source: iMessage: +15109196668

Sta  
Las  
Tim  
TK  
To  
G i  
tec  
onc  
loo  
aca  
(sh  
app  
exa  
tod  
G -  
Joh  
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who

From: [REDACTED] Lior Ron

Participants: [REDACTED] Anthony Levandowski (owner)

[REDACTED] Lior Ron

Source: iMessage: [REDACTED]

Start Time: 3/6/2016 12:49:28 AM(UTC+0)

Last Activity: 3/16/2016 7:39:03 AM(UTC+0)

Time Stamp: 3/13/2016 4:34:10 AM(UTC+0)

TK - This is all about winning

To win we have to cross the finish line first, losing is not an option

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TX-5472, Page 1 of 3

Northern District of California  
Trial Exhibit 5472  
Case No. 3:17-cv-00939-WHA  
Date Entered  
By  
Deputy Clerk

STROZ\_R\_000003106



WAYMO

TX 5472

WDX1-35

## Project Zing Review

April 11, 2016

Project Zing Review

### Consumer / Lasers

#### Rationale

- Lasers are critical to Uber's AV development, and Ottomotto is expected to de-risk our current laser approach
- Ottomotto could significantly enhance our overall AV efforts and potentially accelerate current timelines

TX-0910, Page 1 of 7

Anisa Winberley, CSR 7778

By

Deputy Clerk





## Project Zing Review

April 11, 2016

Project Zing Review

### Terms

- **\$100k upfront cash + up to ~12M shares** of Uber restricted stock, totaling up to **~\$592M** based on Series G price of \$48.77
- Vesting of restricted stock  **tied to achievement of technical milestones**, 20% tied to laser milestones and 80% tied to overall AV success\*
- Minimum of 25 engineers to join Uber (could be as many as 50-100)
- **Uber will indemnify** a minimum of 5 key employees and Ottomotto for specific claims from former employers (e.g. IP, non-solicit), subject to certain restrictions and limitations



# “It is war time.” -- Priority from Kalanick to Find And Use “Cheat codes”

4/28/16

- Bares' April 28 notes on “Top Priorities from TK”

Top Priorities from TK redirect (28 April 2016)

Cheat codes. Find them. Use them.

John	talk to Jeff
John	reviewing it
John	talk to Dan
John	discuss with
John	Get out the
John	talk to Ryan
John	talk to Brad
John	discuss with
John	talk to Rick
John	work with Ed
John	discuss with
John	before May
John	need to do
John	work with
Linn	have to get
Linn	gameplan
Linn	CV group
Linn	metrics
Linn	give some
Linn	quick review
Linn	Team hours
Linn	
Chris	info needs
Chris	How do we
Chris	How do we
Chris	How do we
Chris	need to meet
Chris	need to get
Chris	if not within
Chris	the strategic
Platt	we need to
Case	talk to Brad
Justin	discuss with
Blayne	needs to be
Blayne	needs to be
Blayne	talk to
Blayne	get out of

Tone

the golden time is over. It is war time.

what are smart risks that we can take today? (how to reduce the downside of a risk)

thinking through outcomes helps to reduce risk

we need to celebrate the moment of moving past the golden time

going slower is NOT an option anymore

can't be attached to the past (no sacred cows either)

get into the mode of "listening to the world" => lots of data collect, bugs, triage, roll

too slow and "poof", we are gone

there are rules that separate order and chaos. Need to understand those rules.

focus on the troubling indicators and fix them, rather than enjoying the positive ones and relaxing

DO NOT upgrade the car at the cost of slowing down development of the stack

top-down vs bottom up. In each area what do we need to do to win. Then figure out how to get there.

crisp goals to unique people. Crisp rules. KILL the word "general" wrt general solutions

fix exactly what you see is broken and just that.

ok to set closer goals, but don't lower longer goals

Reality that matters is catching up. This is the only reality that matters.



- Bares' April 28, 2016 notes of a "Jam" with Kalanick

TK Jam on how to move faster  
wants AL to allow us to leapfrog

URGENT CONFIDENTIAL - ATTORNEY'S EYES ONLY  
UBF00000505.xlsx

United States District Court  
Northern District of California  
**Trial Exhibit 682**  
Case No. 17-cv-00939-WHA  
Date Entered \_\_\_\_\_  
By \_\_\_\_\_  
Deputy Clerk

Deposition Exhibit  
682

TX-0682, Page 1 of 33

# Uber: "war for self-driving is truly existential for Uber"

5/13/16

Message

**From:** Jeff Holden [jh@uber.com]  
**Sent:** 5/13/2016 3:38:03 PM  
**To:** Travis Kalanick [travis@uber.com]  
**Subject:** Fwd: Zoom: Mobileye Sync

Here's the n

----- For  
From: Jeff I  
Date: Fri, M  
Subject: Re  
To: Drew B

Hey again,

I'm reflectin  
call later an

Here's the note to Drew I mentioned in my previous email to you.

Let me start  
trying to get  
second S cu  
extremes co  
Stepping va  
energy on th

In that light  
this is all in  
CV side so  
down on an

- We
- The
- Dec
- beac
- The
- mas
- We
- For

Let me start, though, by making the point that all the thrash and discussion over the past few weeks is about trying to get to the right answer. This war for self-driving is truly existential for Uber: we'll either start up our second S curve of growth or we'll die. There might be in-between cases, but it's definitely easy to see how the extremes could play out. So this is extremely important to get right, and in line with our Meritocracy & Toe Stepping value, we ruthlessly seek truth, and ask everyone to focus 100% of their creative and problem-solving energy on that.

refocusing the current team on laser)

- We have two story arcs: the battle and the war.
- The \*battle\* is about what we need to do to get ourselves into a sufficiently competitive position before December that G doesn't walk away with the crown for future of ride sharing. It's about establishing beach heads, being in the game in a credible way.
- The \*war\* is the long-term defeat of G and others so we afford ourselves the opportunity to extend our massive scale business into the future. This will be about who gets NSD self-driving to scale first.

HIGHLY CONF



WAYMO

TX 4481

WDX1-43

# Uber's Lawyer – Levandowski Had Disks With "Everything You Need To Create A Self-Driving Car"

**From:** Tate, Eric Akira  
**Sent:** Wednesday, March 23, 2016 8:51 PM  
**To:** Tate, Eric Akira  
**Subject:** Stroz Day 2 Download by Stroz with OMM (Amdursky and Bentley) - EAT Notes

Hanley, Mary, Eric A.

1. Finished at 7:40 p.m.
2. Finished with A. Did not give him back his laptop. A will talk to his lawyer to come up with a remediation plan. We did confirm with A orally in the interview that he did not sync up with Newco at all. He only accessed the emails through the web. Confirmed that the Google related mails (1000s of them most recently 2014). User can

3. **From:** Tate, Eric Akira  
**Sent:** Wednesday, March 23, 2016 8:51 PM  
**To:** Tate, Eric Akira  
**Subject:** Stroz Day 2 Download by Stroz with OMM (Amdursky and Bentley) - EAT Notes

late. A left that meeting with an unspoken understanding that he should delete it. It was five discs that were shredded. Do not know if he accessed any of the discs since he left Former Employer. Think it was several years ago, at least a year or longer. A had not given access to anyone else. A also destroyed the box of stuff

- 4.
- 5.
- 6.
3. DD. A went into great detail. Had regular status meetings with Unicorn. Three minute discussion. Prior to it, A was collecting any Former Employer information, property at home. He found some discs that had highly confidential information (source code, design software) everything you need to create a self-driving car. He

Eric A  
425 M  
E-Mail

**From:** Tate, Eric Akira  
**Sent:** Tuesday, March 22, 2016 10:04 PM  
**To:** Tate, Eric Akira  
**Subject:** Stroz Day 1 Download by Stroz with OMM (Amdursky and Bentley) - EAT Notes

1



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TX-5073, Page 1 of 7

UBER00324103



WAYMO

TX 5073

WDX1-59

# Uber's Head of ATG Said One Day with Levandowski Could Save Months of Work (At \$20 Million/Month)

- Bares' December 20, 2015 Notes in Advance of Levandowski Meeting

NEWCO, Anthony Levandowski

NEWCO, Anthony Levandowski

\* \* \*

## The chess game

AL clearly is connected, smart, motivated and driven to move autonomy to the marketplace  
he has autonomy in his blood.

he would bring (filled) advice about what to try and not try... that is a day with him and our team could save us months towards 2020 (month = \$20M run rate)

business model 1 - busby was market will solve the highway at speed self driving and self parking and pull on urban driving

COGS for this is 8000

data collection, data processing model, machine learning

with the model, we could just launch on Uber cars and collect passively before they are ready with it

buy 1000-10K of these for this purpose (8000)

data flows into their system but we get all of the raw data

they would provide their labeling approach and we would get manual labelled and possibly ML labelled data

they get an early volume customer

3500	cost to us
8000	units
28,000,000	

business model 2 - DRIFT tracking

remove one driver from the truck

Claims to have helped V develop their laser first time

Claims to have build a long range laser for google and developed google's scanner

Going to take most laser team from Google, some perception team, some planning team - depending how many they take

Missing with TX:

Risk they fail on first batch (our 5-10M is flushed)  
they get bought by a competitor or their product enables their competitor

United States District Court  
Northern District of California  
**Trial Exhibit 170**  
Case No. 17-cv-00099-WHA  
Date Entered \_\_\_\_\_  
By \_\_\_\_\_  
Deputy Clerk

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TX-0170, Page 1 of 27

UBER00060321



WAYMO

TX 170

WDX1-73

# Ottomotto Ballparked Acceleration Value at Several Hundreds of Millions

To: Lior Ron[lioron@gmail.com]  
From: Lior Ron  
Sent: Sat 1/2/2016 6:49:46 AM  
Importance: Normal  
Subject: link  
Received: Sat 1/2/2016 6:49:46 AM

connect on con  
- help Uber wi  
- a self driving  
future happen  
- a network of  
- potential nev  
make him mak  
value:  
accelerate: \$30  
+ accelerate -  
aftermarket se  
not putting va  
trucking - \$70  
structures:  
- wholly owne  
- long term co  
of top) - we si  
- transactional

**To:** Lior Ron[lioron@gmail.com]  
**From:** Lior Ron  
**Sent:** Sat 1/2/2016 6:49:46 AM  
**Importance:** Normal  
**Subject:** link  
**Received:** Sat 1/2/2016 6:49:46 AM

connect on concrete vision:  
- help Uber win the self driving race

\* \* \*

value:

accelerate: \$300-\$500M / year, cut at least a year, probably more  
+ accelerate - reduce capital cost to compete with G in the meantime - few \$100Ms on top

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RON0000893

TX-4313, Page 1 of 1



WAYMO

TX 4313

WDX1-74

# Present Value of "Incremental EBIT Contribution" Between \$836 Million to \$3.9 Billion

## PV of Incremental EBIT Contribution Outweighs NewCo's Equity Compensation

