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Attorneys for Plaintiffs
KEVIN HALPERN and
CELLURIDE WIRELESS, INC.

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
IN THE CITY AND COUNTY OF SAN FRANCISCO**

**KEVIN HALPERN & CELLURIDE
WIRELESS, INC.**

Plaintiffs,

v.

**UBER TECHNOLOGIES INC.,
TRAVIS KALANICK, GARRETT
CAMP, BILL TRENCHARD, SCOTT
BELSKY, BILL GURLEY,
BENCHMARK CAPITAL,
BENCHMARK, FOUNDER
COLLECTIVE, FIRST ROUND
CAPITAL, RAISER L.L.C., RAISER
CA L.L.C. and DOES 1-250.**

Defendants.

Case No. CGC-15-545825

**PLAINTIFFS' TRADE SECRET DISCLOSURES
PER CALIFORNIA CODE OF CIVIL
PROCEDURE § 2019.210**

**PLAINTIFFS' TRADE SECRET DISCLOSURES PER
CALIFORNIA CODE OF CIVIL PROCEDURE § 2019.210**

1 Plaintiffs Kevin Halpern and Celluride Wireless, Inc. (“Plaintiffs”) make the following
2 trade secret disclosures pursuant to CALIFORNIA CODE OF CIVIL PROCEDURE § 2019.210:
3
4

5 **TRADE SECRET DISCLOSURE 1:**

- 6 • **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE
7 HARDWARE THAT PROVIDES ON-DEMAND RIDES THROUGH A SERVER OR
8 GATEWAY**


9 The following are non-limiting, exemplary documents and excerpts illustrating
10 aspects of this trade secret:

11 CELL-000001: the “Celluride Mobile Communication Server” acts as the
12 server/gateway, allowing “Passengers” and “Drivers” to access the “Celluride
13 Mobile Application Server,” which contains the “Subscriber Module,” “Location
14 Determination Module,” “GIS Module,” and “Data Mining” Module, each of
15 which is described in more detail in CELL-000001 – 000004;

16 CELL-000005: “No vehicle hardware”;

17 CELL-000060: “The Celluride Direct Interaction Platform Benefits: The
18 Celluride (DIP) allows a customer’s cell phone to instantly locate and share real
19 time information with the closest driver’s cell phone without the need for a
20 dispatcher. DIP optimizes customer to driver matching based on distance, price,
21 customer preferences, service quality or other criteria set up by the users”;

22

	<ul style="list-style-type: none">○ Entire solution is accessed by a driver’s GPS-enabled handset.○ Individual driver reservation and scheduling system (RSS).○ Optional to accept or reject a pickup.○ No vehicle hardware.
Drivers	

23 **CELL-000005**

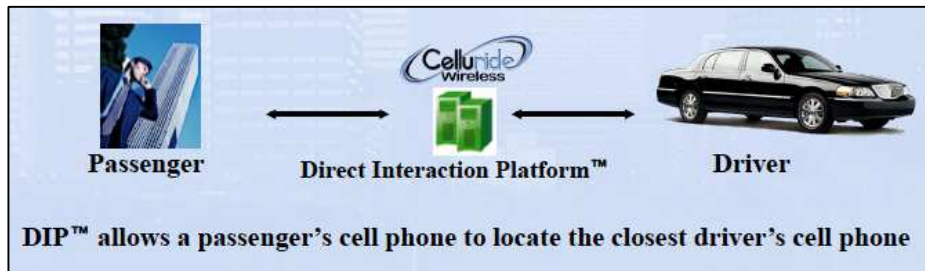
24 **Celluride Wireless develops cell phone location software designed specifically for the
25 black car and limousine industry. Our *PassengerFinder*™ black car and limo solution is
26 a cell phone-to-cell phone *Direct Interaction Platform (DIP)*™ that allows a passenger to
27 directly locate the closest driver and take a ride.**

28 **CELL-000005**

Fleet Requirements and Deployment

- No new equipment nor any capital expenditures.
- Integrates with existing dispatch, accounting and billing software.

CELL-000006



CELL-000014

The Celluride Direct Interaction Platform (DIP™) Benefits

The Celluride (DIP™) allows a customer's cell phone to instantly locate and share real time information with the closest driver's cell phone without the need for a dispatcher. DIP™ optimizes customer to driver matching based on distance, price, customer preferences, service quality or other criteria set up by the users. DIP™ helps fleets find new customers thus increasing their revenues while, at the same time, reducing marketing, dispatch employee, equipment and communication costs (no in-vehicle GPS device required).

CELL-000060

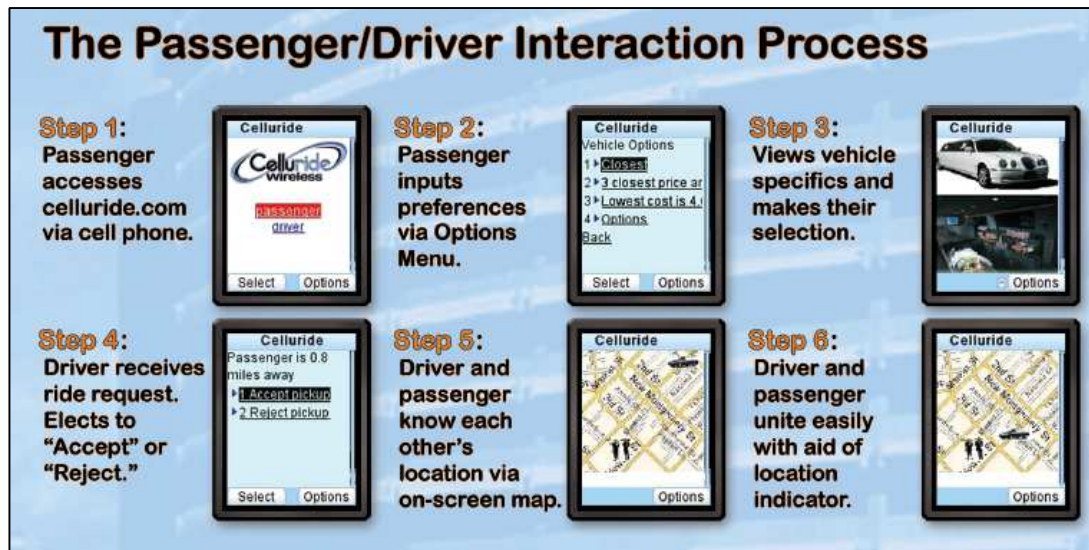
TRADE SECRET DISCLOSURE 2:

- **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE HARDWARE UTILIZING A MOBILE APPLICATION**

The following are non-limiting, exemplary documents and excerpts illustrating aspects of this trade secret:

CELL-000005: "Celluride Wireless develops cell phone location and transportation management software designed specifically for the black car and limousine industry. Our Black Car and Limo Finder is a cell phone to cell phone Direct Interaction Platform (DIP) that allows a passenger to directly locate the closest driver and take a ride. The convergence of cell phones to support GPS and maps is the only next generation wireless technology that finds new passengers for your vacant vehicles";

CELL-000059: “Celluride’s first vertical market is the limo and black car market”;



CELL-000005

Celluride Wireless develops cell phone location software designed specifically for the black car and limousine industry. Our *PassengerFinder*™ black car and limo solution is a cell phone-to-cell phone *Direct Interaction Platform (DIP)*™ that allows a passenger to directly locate the closest driver and take a ride.

CELL-000005

TRADE SECRET DISCLOSURE 3:

- **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE HARDWARE UTILIZING MULTIPLE FLEETS**

The following are non-limiting, exemplary documents and excerpts illustrating aspects of this trade secret:

CELL-000005 - 000006: “Turnkey fleet and driver registration. . . . Credit card billing results in instant payments to your fleet. . . . During our product development phase Celluride is working with unique fleets to ensure that our solution features are those most beneficial to your fleet”;

CELL-000060: Black Car and Limo fleet interaction and “will involve 2-4 fleets”;


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Fleets desire new customers

- 4 fleets partners for Launch
- Fleets will share minimum 10%

CELL-000021



Value Prop

- Auction market
- End dispatch sole dependency
- DIP™ instant & future booking

CELL-000038

1 **TRADE SECRET DISCLOSURE 4:**

- 2
- 3 • **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE**
4 **HARDWARE UTILIZING PERSONAL USER LOCATION HISTORY**

5 The following are non-limiting, exemplary documents and excerpts illustrating
6 aspects of this trade secret:

7 CELL-000103: “Passenger/Ride History Services – accesses and updates
8 location-based ride history information for use in future route planning and
9 customer support purposes”;

10 CELL-000103: “Used to reduced route planning efforts for repetitive ride
11 requests. . . . Also used to confirm or validate ride history in support of customer
12 service and set/update/optimize customer preferences”;

13

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Current use case	vs.	
1. Dispatch sends pickup message		1. Pickup info direct to phone
2. Dispatch sends pickup details		2. Address info on phone
3. Unaware if passenger is at pickup		3. View passenger on map
4. Ensure voucher info accuracy		4. Fare time and location stamped

16 **CELL-000031**

17 **Passenger/Ride History Service – accesses and updates location-based ride history**
18 **information for use in future route planning and customer support purposes. Used to**
19 **reduce route planning efforts for repetitive ride requests, e.g., a passenger that makes a**
20 **series of service requests involving the same pickup and drop-off location-times. Also**
21 **used to confirm or validate ride history in support of customer service and**
22 **set/update/optimize customer preferences.**

23 **CELL-000103**

24 **Passenger History Log – captures the ride history for passengers in terms of pickup &**
25 **drop-off times, routes, drivers, etc.**

26 **CELL-000105**

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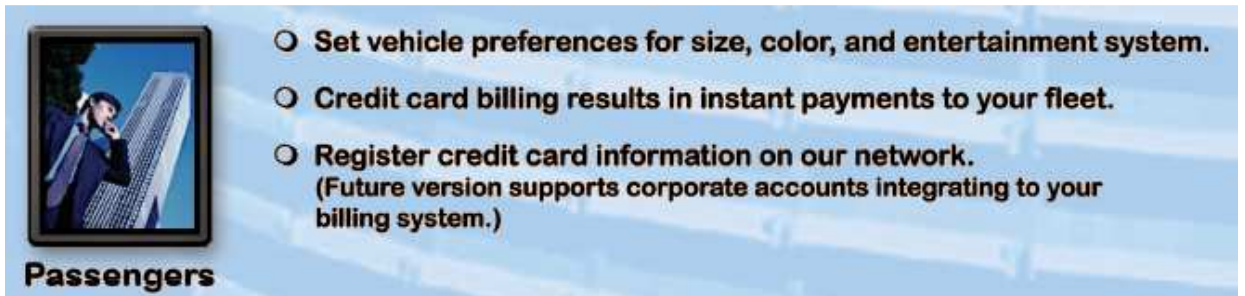
TRADE SECRET DISCLOSURE 5:

- **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE HARDWARE WHEREBY A PASSENGER CAN VIEW VEHICLE SPECIFICS ON A MOBILE DEVICE AND CHOOSE A VEHICLE AND/OR SET PREFERENCES**

The following are non-limiting, exemplary documents and excerpts illustrating aspects of this trade secret:

CELL-000005: “Passenger inputs preferences via Options Menu. Views vehicle and makes their selection”;

CELL-000005: “Set vehicle preferences for size, color, and entertainment system”;



Passengers

- Set vehicle preferences for size, color, and entertainment system.
- Credit card billing results in instant payments to your fleet.
- Register credit card information on our network. (Future version supports corporate accounts integrating to your billing system.)

CELL-000005



Step 2:
Passenger inputs preferences via Options Menu.



Celluride
Vehicle Options
1 ▶ **Closest**
2 ▶ 3 closest price ar
3 ▶ Lowest cost is 4.
4 ▶ Options
Back
Select Options

Step 3:
Views vehicle specifics and makes their selection.

Celluride
Options

CELL-000005

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	Current use case	vs.	
	<ol style="list-style-type: none"> 1. Call dispatch 2. Potentially wait for dispatch 3. Unaware of vehicles distance 4. Unaware of vehicle style, pictures 5. Unaware of vehicle arriving 6. Fill out and sign voucher 		<ol style="list-style-type: none"> 1. Use cell phone or internet 2. Instant or reserved ride 3. Exact distance prior to order 4. View vehicle pictures 5. View vehicle on map 6. Automatic voucher processing
Passenger			

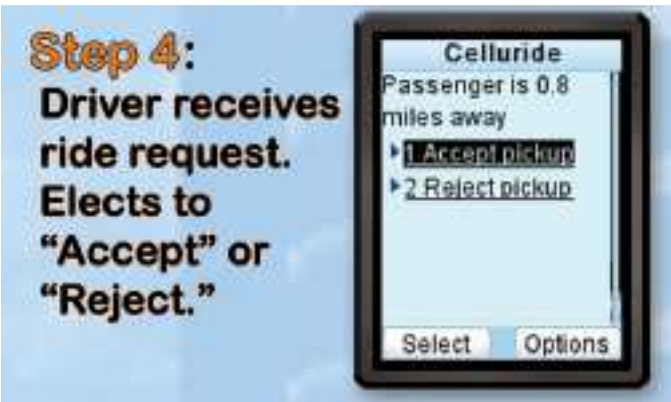
CELL-000030

TRADE SECRET DISCLOSURE 6:

- **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE HARDWARE WHEREBY A DRIVER CAN CHOOSE TO ACCEPT OR REJECT RIDER ON A MOBILE DEVICE**

The following are non-limiting, exemplary documents and excerpts illustrating aspects of this trade secret:

CELL-000005: “driver receives ride request. Elects to “Accept” or “Reject”;



CELL-000005

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TRADE SECRET DISCLOSURE 7:

- **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE HARDWARE WHEREBY A SERVICE MODULE AUTHENTICATES A USER IDENTITY**

The following are non-limiting, exemplary documents and excerpts illustrating aspects of this trade secret:

CELL-000002: Subscriber Module: Responsible for all subscriber related operation, including: provisioning, all subscribers need to be registered in the system to use the Celluride’s service; authentication: authenticate an incoming subscriber’s identity;

<p>Subscriber Module:</p> <p>Responsible for all subscriber related operation, including:</p> <p>(1) Provisioning: all subscribers need to be registered in the system to use the Celluride’s service.</p> <p>(2) Authentication: authenticate an incoming subscriber’s identity</p> <p>(3) Transaction: each time a Celluride transaction occurs, there will be multiple transaction states involved. All transaction details will be recorded thru this module.</p> <p>(4) Billing: handles all billing related issues. Billing can be per subscriber, per transaction, or tightly integrated with the carriers or service providers.</p>

CELL-000002

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TRADE SECRET DISCLOSURE 8:

- **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE HARDWARE THAT PROVIDES REAL TIME PRICING AND MAPPING**

The following are non-limiting, exemplary documents and excerpts illustrating aspects of this trade secret:




CELL-000005: “Driver and passenger know each other’s location via on-screen map; Driver and passenger unite easily with aid of location indicator”;

CELL-000059: “Celluride is building a mobile device location based platform for mobile workers to connect them in real time to customers based on location, price, service requirements, and vehicle pictures DIP’s ability to seamlessly handle features such as an instant real time pricing marketplace, real time mapping to users can see how far away a ride is prior to ordering, then view the vehicle moving toward them on a map”;

	Current use case	vs.	
 Passenger	<ol style="list-style-type: none">1. Call dispatch2. Potentially wait for dispatch3. Unaware of vehicles distance4. Unaware of vehicle style, pictures5. Unaware of vehicle arriving6. Fill out and sign voucher		<ol style="list-style-type: none">1. Use cell phone or internet2. Instant or reserved ride3. Exact distance prior to order4. View vehicle pictures5. View vehicle on map6. Automatic voucher processing
 Corporate Administrator	<ol style="list-style-type: none">1. Manually enter voucher data2. No employee ride control3. No reporting & analysis		<ol style="list-style-type: none">1. Time & location stamped data2. Set policy for ride usage3. Detailed reporting & analysis

CELL-000030

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	Current use case	vs.	
 Driver	<ol style="list-style-type: none"> 1. Dispatch sends pickup message 2. Dispatch sends pickup details 3. Unaware if passenger is at pickup 4. Ensure voucher info accuracy 		<ol style="list-style-type: none"> 1. Pickup info direct to phone 2. Address info on phone 3. View passenger on map 4. Fare time and location stamped
 Dispatcher/ Operations	<ol style="list-style-type: none"> 1. Dispatcher earns \$ waiting for call 2. Dispatcher relays pickup info 3. Dispatcher relays address 4. Dispatcher gets vehicle status call 5. Fleet enters voucher info 		<ol style="list-style-type: none"> 1. Ride accepted by driver 2. Passenger sends Driver info 3. Driver views passenger on map 4. Passenger views vehicle on map 5. Instant voucher invoice

CELL-000031

TRADE SECRET DISCLOSURE 9:

- **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE HARDWARE THAT CONNECTS IDLE DRIVERS WITH RIDERS WITH REAL TIME DEMAND**

The following are non-limiting, exemplary documents and excerpts illustrating aspects of this trade secret:

CELL-000059: “Celluride is building a mobile device location based platform for mobile workers to connect them in real time to customers based on location, price, service requirements, and vehicle pictures”;

4 Fleets



- New Passenger Generation
- Cost Savings
- Reduce idle time
- No voucher cost savings

CELL-000028

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<p>Customer</p>  <ul style="list-style-type: none"> ➤ No dispatch or hail wait ➤ Know arrival time ➤ Auction savings 	<p>Fleet</p>  <ul style="list-style-type: none"> ➤ New revenue ➤ Cost savings ➤ Hails & dispatch plus Celluride ➤ On time passengers, save an hour a day
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CELL-000058

TRADE SECRET DISCLOSURE 10:

- **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE HARDWARE THAT CONNECTS DRIVERS AND RIDERS BASED ON REAL-TIME DEMAND, LOCATION, PRICE, SERVICE REQUIREMENTS, AND/OR SERVICE PREFERENCES**

The following are non-limiting, exemplary documents and excerpts illustrating aspects of this trade secret:

CELL-000059: “Celluride is building a mobile device location based platform for mobile workers to connect them in real time to customers based on location, price, service requirements, and vehicle pictures”;

Celluride Wireless Overview
Celluride is building a mobile device location based platform for mobile workers to connect them in real time to customers based on location, price, service requirements and vehicle pictures. Our Direct Interaction Platform (DIP™) is customizable for private transportation (limos, black cars, taxis, paratransit vehicles), tow trucks, mobile repair fleets, messengers and package delivery, as well as any future mobile based worker. The DIP™ has core features including voice interaction or key entry, cross carrier communication, auctions, mapping and navigation, and flexible booking to find a service instantly or to make a reservation using a cell phone, from any internet connection or calling Celluride’s 800 phone number.

CELL-000059

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TRADE SECRET DISCLOSURE 11:

- **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE HARDWARE TO INCREASE RIDER UTILIZATION OF IDLE VEHICLES**

The following are non-limiting, exemplary documents and excerpts illustrating aspects of this trade secret:

CELL-000028: “Reduce Idle Time”;

CELL-000067: “Drivers can either be the employees of the Fleet Operators or Independent vehicle owners that are contracted by the Fleet Operators;”

CELL-000068: “Drivers are looking for ways to service more passengers and reduce or eliminate idle time”;



CELL-000028

2.5 Driver Needs

In general, drivers of taxis, black car's, limo's and para transit vehicles have passenger generation problems that increase the cost of their service. Therefore, drivers are looking for ways to service more passengers and reduce or eliminate idle time

CELL-000068

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TRADE SECRET DISCLOSURE 12:

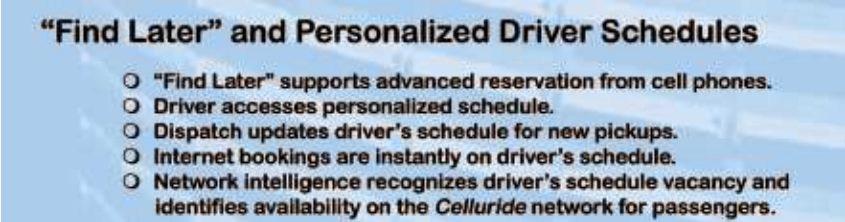
- **AUTOMATED DISPATCH FOR ON-DEMAND CAR SERVICE WITHOUT VEHICLE HARDWARE THAT PROVIDES RIDES ON DEMAND OR THROUGH A RESERVATION SYSTEM**

The following are non-limiting, exemplary documents and excerpts illustrating aspects of this trade secret:

CELL-000005: the Direct Interaction Platform supports instant matching and future reservations;

CELL-000030: “Instant or reserved ride”;

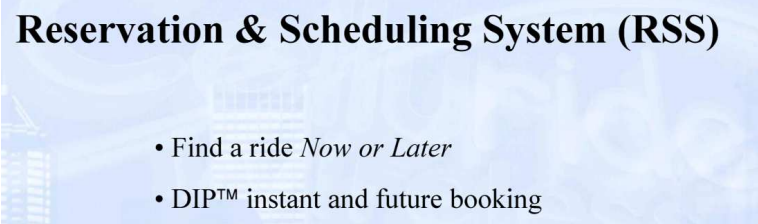
CELL-000048: “Find a ride Now or Later”;



CELL-000005



CELL-000030



CELL-000048

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November 22, 2016

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**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
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Plaintiffs,

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UBER TECHNOLOGIES INC. et al.

Defendants.

Case No. CGC-15-545825

CERTIFICATE OF ELECTRONIC SERVICE

I, **COLBY B. SPRINGER**, counsel of record for the above-identified Plaintiffs, certify that I am not a party to the above-captioned action. On **NOVEMBER 22, 2016**, I caused **PLAINTIFFS' TRADE SECRET DISCLOSURE PER CALIFORNIA CODE OF CIVIL PROCEDURE § 2019.210** to be electronically served on the recipients as identified below:

Ragesh Tangri RTangri@durietangri.com

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November 22, 2016

By: 

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