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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
AT PORTLAND

CITY OF PORTLAND, a municipal corporation,)
)
) Plaintiff,)
)
) v.)
)
) UBER TECHNOLOGIES, INC., a Delaware)
) corporation,)
)
) Defendant.)
)
)
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No. _____
DECLARATION OF BROOKE
STEGER IN SUPPORT OF
DEFENDANTS' NOTICE OF
REMOVAL

1. I am the General Manager of Uber Technologies, Inc., overseeing the Pacific Northwest and I have personal knowledge of the facts stated herein.
2. If Uber is prohibited from operating its business in the City of Portland, Uber would suffer significant lost profits. I am familiar with Uber's business and profits generally in Seattle, WA, Vancouver, WA, and in the communities surrounding Portland. Based on my experience in those cities and given the demand for Uber's services by Portland residents, interested drivers, and local businesses, the lost profits to Uber as a result of an injunction prohibiting Uber's business in Portland would certainly exceed \$100,000.
3. If Uber were required to obtain licenses and permits and change its business so that it operated as if it were a Taxicab Company or a Limited Passenger Transportation Company in

1 Portland, as described in and regulated by the Portland City Code, that would cost in excess of
2 \$100,000.

3
4 I declare that the foregoing is true and correct to the best of my knowledge under
5 penalty of perjury under the laws of the states of Washington and Oregon.

6
7 Executed at PORTLAND, OR this 7 day of December, 2014.

8
9 By 
10 BROOKE STEGER

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