

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
GAINESVILLE DIVISION**

CASE NO: 1:15-cv-00206-MW-GRJ

UBER PROMOTIONS, INC.
a Florida corporation,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.
a Delaware corporation,

Defendant.

**DEFENDANT UBER TECHNOLOGIES, INC.’S REPORT REGARDING COMPLIANCE
WITH PRELIMINARY INJUNCTION ORDER**

Defendant Uber Technologies, Inc. (“Defendant”) sets forth its compliance with the specific provisions of the Court’s Order on Preliminary Injunction entered on February 16, 2016 (“Order”), ECF No. 75, as follows:

1. UBEREVENTS SERVICE IN ALACHUA COUNTY.

In Paragraph 2 of the Order the Court ordered:

Defendant (including its officers, agents, servants, employees, attorneys, and other persons in active concert or participation with it) is preliminarily enjoined from using the UBER mark (or any variant thereof) in connection with the UberEVENTS service in the Gainesville market (Alachua County) until further notice.

Order at 63, ¶ 2.

DEFENDANT’S COMPLIANCE:

Defendant has ceased advertising its UberEVENTS product in Alachua County and disabled the UberEVENTS product within Alachua County in compliance with Paragraphs 2(a) and (b) of the Order, as detailed below.

a. Advertising of the UberEVENTS Service in Alachua County.

In Paragraph 2(a) of the Order the Court ordered:

Defendant (including its officers, etc.) shall not advertise the UberEVENTS service in Alachua County or cause it to be advertised in Alachua County until further notice. A posting promoting UberEVENTS placed on the Facebook wall or page of an entity with its principal place of business in Alachua County is an advertisement. A posting promoting UberEVENTS placed on the Facebook wall or page of a real person whose usual place of abode or residence is in Alachua County is an advertisement.

Order at 63 to 64, ¶ 2(a).

DEFENDANT’S COMPLIANCE:

Pursuant to the Order, Defendant will not advertise UberEVENTS within Alachua County until further notice. Defendant notified individuals responsible for marketing in Alachua County that all advertising for UberEVENTS in Alachua County must cease immediately and until further notice. No new local advertising for UberEVENTS has been initiated in Alachua County.

b. Disabling of the UberEVENTS Service in Alachua County.

In Paragraph 2(b) of the Order the Court ordered:

Defendant must ensure that if a person attempts to “book” an event in Alachua County through the UberEVENTS webpage, that booking is not allowed to be completed.

Order at 64, ¶ 2(b).

DEFENDANT’S COMPLIANCE:

UberEVENTS is a product accessed on Defendant’s website at www.uber.com/events (the “UberEVENTS web page”) that enables users to pay for others’ rides to an event requested via the UBER software application. To comply with the Court’s order, Defendant incorporated into its UberEVENTS web page a “geofence,” which is a virtual perimeter that corresponds with a real-world geographic area – in this instance, all of Alachua County. If a person attempts to “book” rides using the UberEVENTS product in connection with an event at an address located within the geofence, Defendant’s system will block the purchase of rides for that event.

Defendant went above and beyond what the Court ordered by (1) disabling the UberEVENTS product for users who had an IP (Internet Protocol) address from Gainesville when they first created their UBER accounts and (2) disabling the UberEVENTS web page for users with an IP address from anywhere within Alachua County.

2. 352-AREA CODE PHONE NUMBER.

In Paragraph 3 of the Order, the Court ordered:

Defendant must set up a 352-area-code phone number to handle phone calls.

Order at 64 ¶ 3.

DEFENDANT’S COMPLIANCE:

Defendant set up a 352-area code telephone number, specifically, (352) 325-1319, with the following voice mail greeting:

Thank you for calling Uber Technologies, creator of the Uber mobile app for iOS and Android devices that connects riders and drivers on demand. If you have any questions about our services or need assistance with a rider-related issue, please hang up and visit help.uber.com or www.uber.com. We do not regularly check voicemails left at this number. If you are calling regarding a non-medical emergency related to an Uber ride, please hang up and dial 352-393-7535. If you are calling regarding a medical emergency please hang up and dial 911. Thank you.

The number to which the message directs callers with non-medical emergencies, (352) 393-7535, is the work phone number of Officer Mike Barnes of the Gainesville Police Department, who is responsible for any inquiries associated with on-demand platforms like Uber.

a. Listing of Phone Number in “All Available Directories.”

In Paragraph 3(a) of the Order the Court ordered:

Defendant must ensure that this phone number is listed in all available directories.

Order at 64 ¶ 3(a).

DEFENDANT’S COMPLIANCE:

Defendant conducted a reasonable search for “all available directories.” Defendant then listed its 352-area code telephone number on B2BYellowpages.com, Yellowpages.com, Addresses.com, YP.com, AreaGuide.net, Smartpages.com, Anywho.com, Showmelocal.com, BestRedYP.com, DexOnline.com, DexKnows.com, Yelp.com, and Superpages.com. Defendant also submitted listing requests for its 352-area code telephone number on Local.com, Whitepages.com, Switchboard.com, and 411.com. The 411.com listing also means that Defendant’s 352-area code telephone number will be available to those calling 4-1-1 for Directory Assistance.

Defendant also confirmed with the Gainesville Chamber of Commerce that Defendant’s 352-area code telephone number would be listed on the Gainesville Chamber of Commerce member-only directory.

Defendant then purchased a premium account with ExpressUpdate.com, enabling it to create multiple business listings across 48 online directories, mobile applications, and search engines, all of which are listed in Appendix A (“App. A.”) filed concurrently herewith. Although it can take up to 60 days for new ads and listings to appear on some of these platforms, Defendant’s 352-area code telephone number is now featured on 40 out of the 48 directories listed in App. A.

b. Use of Search Engine Marketing to Ensure Display of Phone Number.

In Paragraph 3(b) of the Order the Court ordered:

Defendant must ensure that a search conducted with the Google, Yahoo, or Bing search engine using the keywords “Uber Gainesville phone” or “Uber Gainesville phone number” returns a result containing Defendant’s 352-area-code number along with words clearly indicating that the result is associated with Defendant. Such words may include “driver partner,” “app,” or “ride.” Defendant must ensure that this result, while prominently displayed on the search results page, does not re-place the result for Plaintiff’s phone number that is currently returned when a search is conducted using these keywords.²⁵ Compliance may entail using the search engines’ paid advertisement features such as Google AdWords.

n. 25 Appendix A contains a screenshot of a Google search for “uber gainesville phone number” showing where Tech must ensure that its 352-area-code number shows up.

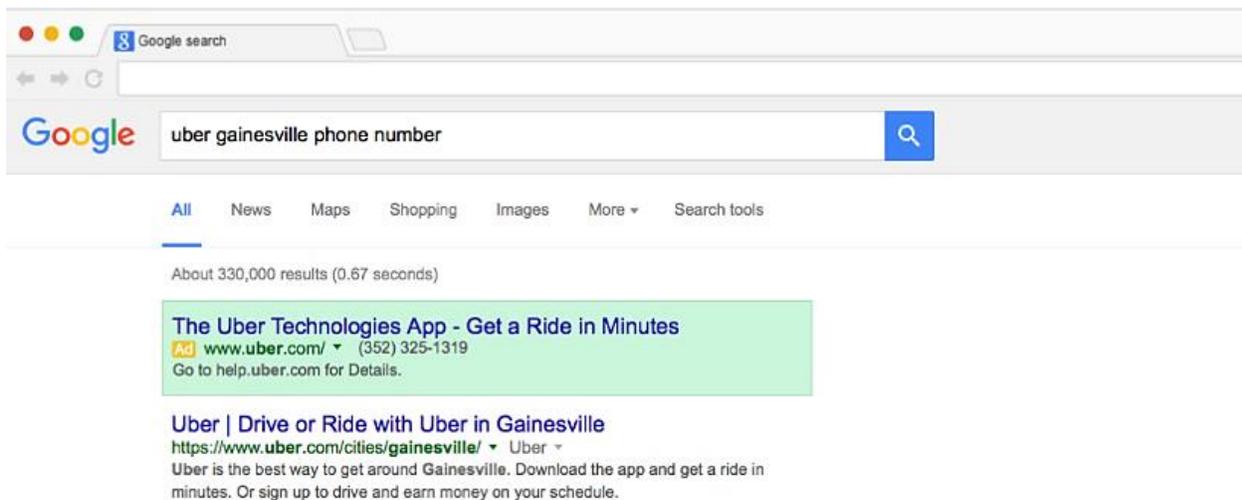
Order at 65 ¶ 3(b).

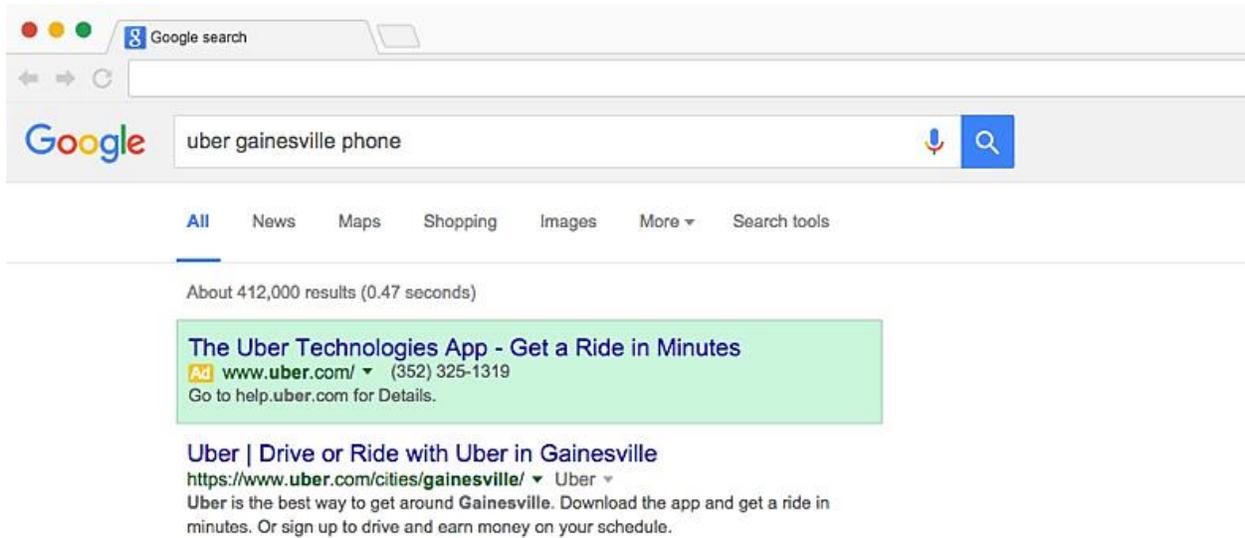
DEFENDANT’S COMPLIANCE:

As one of the leading experts in Internet law and intellectual property, Professor Eric Goldman of the University of Santa Clara School of Law, noted in his report on the Order: “Notice the order didn’t say that Uber should ‘try,’ the order said Uber must ‘ensure.’ Yet, Uber can’t ensure that Google or the other search engines will display any particular organic search results, nor can it ensure exactly what information is presented in those organic results.” E. Goldman, “Court Orders Uber To Control Is Google Search Results” *Technology & Marketing Law Blog* (Feb. 18, 2016) (available March 1, 2016 at

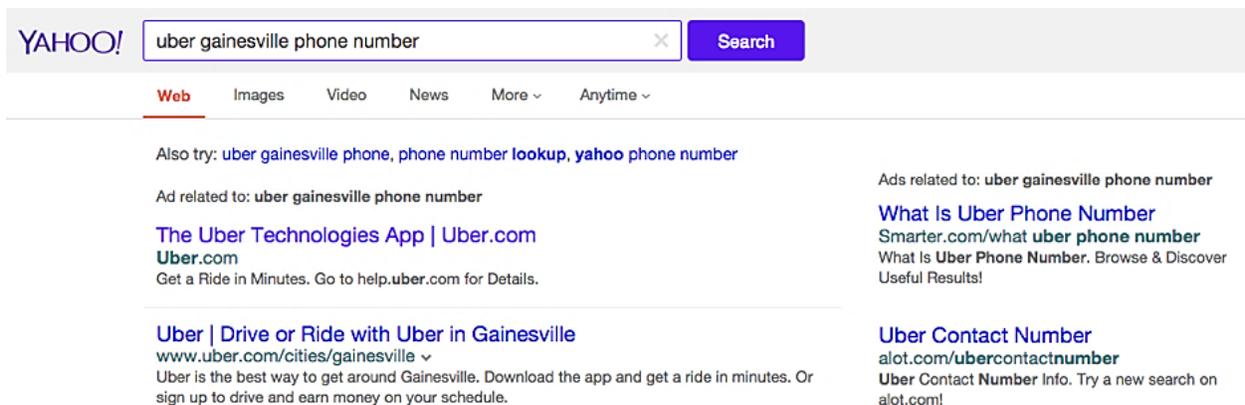
<http://blog.ericgoldman.org/archives/2016/02/court-orders-uber-to-control-its-google-search-results.htm>) (“Goldman Post”). Nonetheless, Defendant has taken numerous steps within its power to achieve the result the Court has ordered.

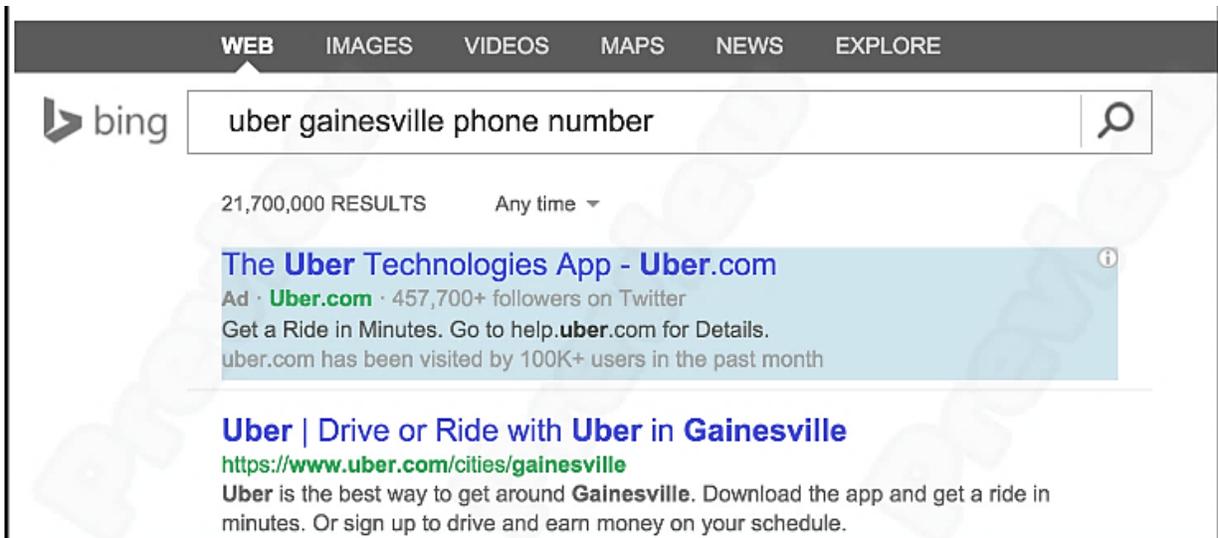
As a result of Defendant's compliance efforts and search engine marketing (“SEM”) campaigns targeted toward Alachua County, when users within Alachua County run a search on the Google search engine for the keyword phrase “Uber Gainesville phone number” or “Uber Gainesville phone,” Defendant’s ad featuring its 352-area code telephone number appears, along with words such as “app” and “ride” that indicate the result is associated with Defendant, as shown here:





Defendant also launched identical SEM campaigns on both the Bing and Yahoo search engines. To date, Bing and Yahoo have not consistently displayed Defendant’s ad featuring its 352-area code phone number when users within Alachua County enter the keyword phrase “Uber Gainesville phone number” or “Uber Gainesville phone.” While the text portion of Defendant’s ad appears, the algorithms Bing and Yahoo uses, which are beyond Defendant’s control, sometimes omit Defendant’s 352-area code phone number – as shown below:





Nonetheless, users within Alachua County that encounter the ad could click on the URL for “Uber.com” featured within the ad, which would lead users within Alachua County to a landing page that prominently features Defendant’s 352-area code phone number.

Moreover, as shown below, users within Alachua County will see Defendant’s 352-area code phone number in the organic search results on the Bing and Yahoo search engines when they enter the keyword phrase “Uber Gainesville phone.”

bing

277,000 RESULTS Any time ▾

Uber.com - The Uber Technologies App
 Ad · [Uber.com](#) · 473,900+ followers on Twitter
 Get a Ride in Minutes. Go to help.uber.com for Details.
 uber.com has been visited by 100K+ users in the past month

AT&T - Your Network | att.com
 Ad · [att.com/network](#) · 746,000+ followers on Twitter
 The AT&T network connects you to more than you might think.
 Building you a better network – AT&T is the nation's most reliable ...
 att.com has been visited by 100K+ users in the past month
 Features: Talk, Text & Data Plans, Help Me Choose a Data Plan and more
 3626 Sw Archer Road, Gainesville · [Directions](#)
 iPad mini 3 on AT&T® · [Schedule an Appointment](#) · iPad Air 2 on AT&T®

Uber Technologies, Inc. · Phone
 300 E University Ave, Gainesville, FL 32601
(352) 325-1319

Uber Technologies, Inc.

[Directions](#) [Website](#)

Address: 300 E University Ave,
 Gainesville, FL 32601
 Phone: (352) 325-1319

Open 24 hours ▾

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[The Uber Technologies App | Uber.com](#)
Uber.com
 Get a Ride in Minutes. Go to help.uber.com for Details.

Uber | Drive or Ride with Uber in Gainesville

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 Uber is the best way to get around Gainesville. Download the app and get a ride in minutes. Or sign up to drive and earn money on your schedule.

Uber near Gainesville, FL



- 1 **Uber** Gainesville, FL
- 2 **Uber Technologies, Incorporated** ✓ 300 E University Ave Gainesville, FL (352) 325-1319 Open 24 hrs
- 3 **Uber Promotions Incorporated** 4010 W Newberry Rd Gainesville, FL (352) 375-4330

Ads related to: [uber gainesville phone](#)

Uber Call Center Number
[alot.com/uber-call-center-number](#)
Uber Call Center Number Info. Try a new search on alot.com!

What Is Uber Phone Number
[Smarter.com/what uber phone number](#)
 What Is **Uber Phone Number**. Browse & Discover Useful Results!

Uber Car Service Rates
[purelocal.com/ubercarservicerates](#)
 Searching for **Uber Car Service Rates**? Find Info and Browse Results Now

c. Use of Search Engine Marketing to Ensure Plaintiff's Phone Number is Not Displayed.

In Paragraph 3(c) of the Order the Court ordered:

Defendant must ensure that a search conducted with the Google, Yahoo, or Bing search engines using the keywords "Uber promotions Gainesville phone" or "Uber promotions Gainesville phone number" does not return a result with Defendant's 352-area-code number.

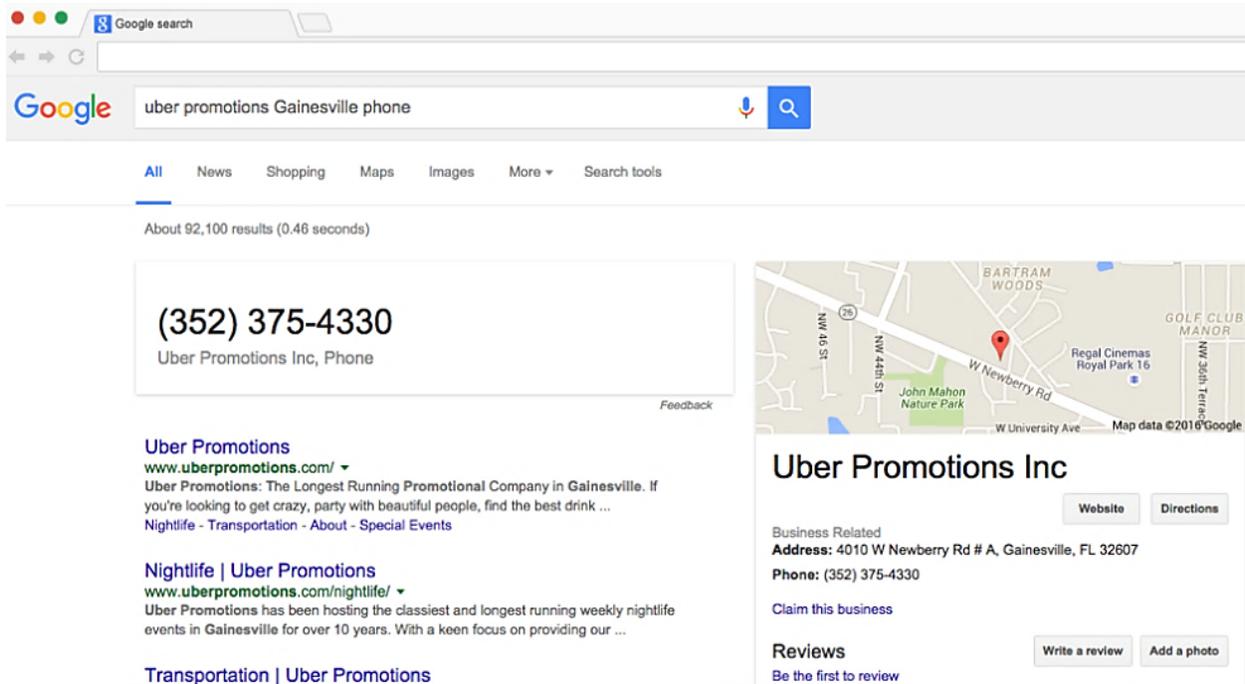
Order at 65 ¶ 3(c).

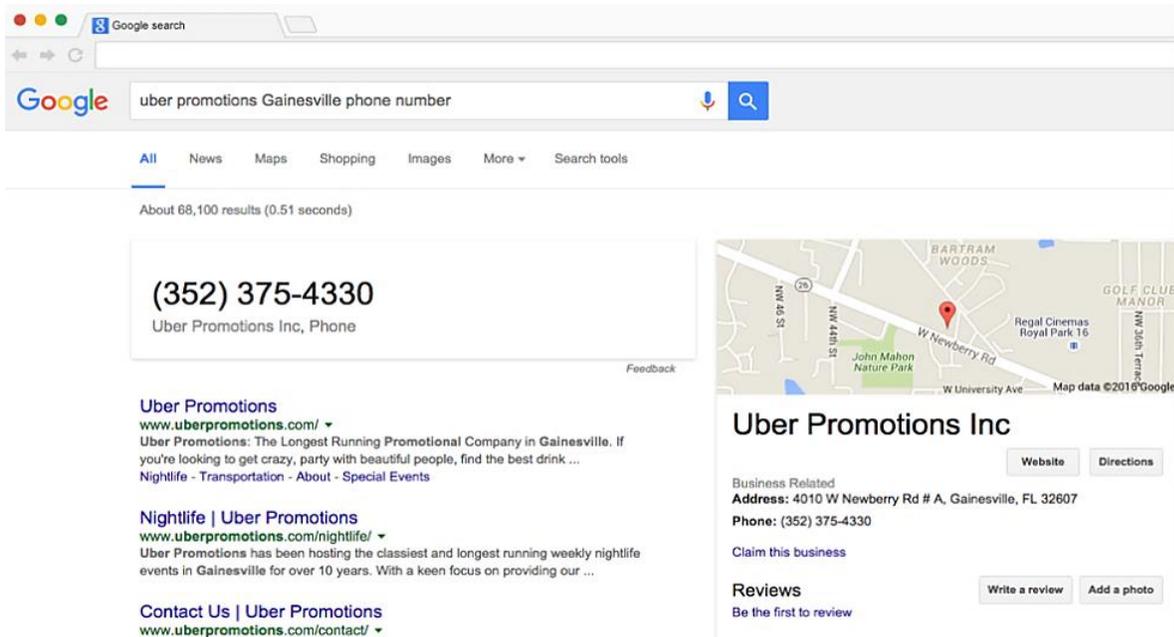
DEFENDANT'S COMPLIANCE:

To prevent Defendant's 352-area code telephone number from being returned when either of the two phrases, "Uber promotions Gainesville phone" or "Uber promotions Gainesville phone number," are searched, Defendant's SEM campaigns on Google, Bing, and Yahoo search engines include the following "negative keyword" search terms: "uber promotions"; "uber promotion"; "uber promotions +Gainesville"; "uber promotions +phone"; "uber promotions +number," as well as "party bus"; "charter bus"; "school bus"; "bus"; "limo"; and limousine." By incorporating "negative keyword" terms in Defendant's Alachua County-specific SEM campaigns, Defendant has instructed the search engines that its ads showing its 352-area code number should not appear as a result of a search with these terms.

Defendant's inclusion of negative keywords in its SEM campaigns on Google has prevented Defendant's ads from appearing when someone in Alachua

County uses Google to search for those keywords. As shown in the two screenshots below, Plaintiff's phone number appears when the phrase "Uber promotions Gainesville phone" or "Uber promotions Gainesville phone number" are searched by people in Alachua County.





Defendant’s inclusion of the same negative key words in its Alachua County-specific SEM campaigns on the Bing and Yahoo search engines also prevents Defendant’s 352-area code phone number from appearing in the search results for the phrases “Uber promotions Gainesville phone” or “Uber promotions Gainesville phone number.” As shown below, users within Alachua County who search Bing or Yahoo for these terms will see Plaintiff’s phone number instead.

bing

7,750,000 RESULTS Any time ▾

AT&T Special Offer | att.com
 Ad · [att.com/buyonegiveone](#) · 746,000+ followers on Twitter
 Ratings: Ease of Purchase 4/5 · Delivery 4/5 · Shipping Options 4/5
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 Pricing, promotions, ... Bring Your Own Phone; Prepaid Plans; ...
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 att.com is rated ★★★★★ (44 reviews)

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 2-10 Lines of Svc, 10 GB of Data Starting at \$130 a month!

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- [Uber in Gainesville VA](#)
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- [Uber Promotions Nashville](#)
- [Chase Uber Promotion](#)
- [American Express Uber Promotion](#)
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 New to Uber? Use Promo Code: uberarchdiscountue for a \$15 credit now!

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 Uber Promotions: The Longest Running Promotional Company in Gainesville. If you're looking to get crazy, party with beautiful people, find the best drink specials in ...

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 Uber Promotions Inc, Gainesville, FL. 11,967 likes · 33 talking about this · 9 were here. For more information: [www.UberPromotions.com...](#)

Uber Promotions Inc Gainesville, FL, 32607 - YP.com
[www.yellowpages.com/gainesville-fl/mip/uber-promotions...](#) ▾
 Get reviews, hours, directions, coupons and more for Uber Promotions Inc at 4010 W Newberry Rd Ste A, Gainesville, FL. Search for other Sales Promotion Service in ...

Ads related to: [uber promotions gainesville phone](#)

Uber Promotion
[www.webcrawler.com](#)
 Webcrawler.com. Search for Uber Promotion With 100's of Results at WebCrawler

Telephone Number For Uber
[alot.com/telephone-number-for-uber](#)
 Telephone Number For Uber Info. Try a new search on alot.com!

Uber Car Service Contact
[purelocal.com/UberCarServiceContact](#)
 Searching for Uber Car Service Contact Number Info? Browse Results Now.

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 \$20 To \$18 UberRide For New Users & Daily Users UberDiscountCodes

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 att.com has been visited by 100K+ users in the past month
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 att.com is rated ★★★★★ (44 reviews)

Schedule an Appointment
 Schedule an In-Store Appointment
 For Help With Your Devices & Plans!

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Store Locator
 Use the AT&T® Retail Store Locator
 & Get the Phone You Want Today!

iPad Air 2 on AT&T®
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 Visit ATT.com today to order
 iPhone 6. Free shipping available.

iPad mini 3 on AT&T®
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Get Virtual Phone Lines - Toll Free 800 Number, Local Number.
 Ad - www.RingCentral.com - 26,500+ followers on Twitter
 Toll Free 800 Number, Local Number. No Activation Fees. Free Trial!

Uber Contact Phone Number - Uber Contact Phone Number.
 Ad - Ask.com/uber contact phone number - 66,800+ followers on Twitter
 Uber Contact Phone Number. Discover and Explore on Ask.com!

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 Email (required) ... Our office: Facebook;

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 www.buzzfile.com/business/Uber-Promotions-Inc-352-375-4330
 Uber Promotions Inc is in the Promotion Service business. View competitors, revenue,
 employees, website and phone number.

Ads

Uber Promotion
 www.webcrawler.com
 Webcrawler.com. Search for Uber Promotion With
 100's of Results at WebCrawler

Phone Number Lookup
 www.Whitepages.com
 Free, Accurate White & Yellow Pages. Reverse
 Search & Zip Code Locator.

Uber Car Service Contact
 purelocal.com/UberCarServiceContact
 Searching for Uber Car Service Contact Number
 Info? Browse Results Now.

Uber Contact Phone Search
 alot.com/ubercontactphone
 Uber Contact Phone Info. Try a new search on
 alot.com!

As Professor Goldman notes, “Uber can’t ensure that Google or the other search engines will display any particular organic search results, nor can it ensure exactly what information is presented in those organic results.” Goldman Post

(emphasis in original). Defendant cannot “ensure” that the search engines will follow every parameter or condition embedded in its SEM campaigns, because each search engine has its own algorithm that determines whether and where a particular ad will appear for the keywords used. Nor can Defendant control “organic” search results, that is, free listings that appear because of what the search engine deems to be relevant to the search terms entered by a user.

Moreover, as Professor Goldman notes, “due to quality scores, Uber can’t guarantee top – or any – AdWord placement no matter how high its CPC [cost per click] bids are.” *Id.*; *see also* Wikipedia, “Quality Score” (available March 1, 2016 at https://en.wikipedia.org/wiki/Quality_Score). A “Quality Score” is assigned to each keyword of an SEM campaign and provides an “estimate of the quality of [one’s] ads and landing pages triggered by that keyword.” Adwords Help: “Check and understand Quality Score” (available March 11, 2016 at <https://support.google.com/adwords/answer/2454010?hl=en>) (“Google Adwords Help”). A high “Quality Score” means that Google’s systems find the ad and landing page relevant and useful to someone viewing the ad. *Id.* The components that make up Quality Scores, including expected click-through rate (measurement of how likely an ad will get clicked when shown for a particular keyword), ad relevance, and landing page experience, along with other factors, determine where an ad appears on the page or whether it appears at all.

Despite the technical challenges, including those beyond its control, Defendant has used its best efforts to comply with all aspects of the Court's Order. Defendant will continue to monitor the performance of its SEM campaigns on the Google, Bing, and Yahoo search engines while the preliminary injunction remains in effect.

Dated: March 31, 2016

COOLEY LLP

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Fax: (305) 446-6191

Attorneys for Defendant

UBER TECHNOLOGIES, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 31, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to electronically receive Notices of Electronic Filing.

s/ Chantal Z. Hwang _____
Chantal Z. Hwang

SERVICE LIST

Uber Promotions, Inc. v. Uber Technologies, Inc.
Case No. 1:15-cv-00206-MW-GRJ

Service via CM/ECF generated Notices of Electronic Filing:

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Attorneys for Plaintiff

Appendix A

1. Citysearch
2. Whitepages
3. Superpages
4. Merchant Circle
5. Local.com
6. Local Database
7. Topix
8. CitySquares
9. LocalPages
10. MojoPages
11. Localstack.com (redirect from MojoPages)
12. Yellowise
13. YellowMoxie
14. Tupalo
15. Avantar
16. EZLocal
17. eLocal
18. ShowmeLocal
19. YellowPageCity.com

20. DexKnows
21. 2findLocal
22. MapQuest
23. Factual
24. Bing
25. Yahoo!
26. Yelp
27. CoPilot
28. YaSabe
29. AmericanTowns.com
30. ChamberofCommerce.com
31. 8coupons
32. Navmii
33. USCity.net
34. Where To?
35. GoLocal247
36. TomTom
37. YellowPagesGoesGreen
38. GetFave
39. ABLocal

40. Citymaps
41. Opendi
42. Pointcom
43. VoteForTheBest
44. Cylex
45. FourSquare
46. My Local Services
47. N49
48. Telenav