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8 Attorneys for Plaintiffs

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN FRANCISCO**

11 JACOB RIMLER, GIOVANNI JONES,
12 DORA LEE, KELLYN TIMMERMAN, and
13 JOSHUA ALBERT, on behalf of themselves
14 and others similarly situated and in their
capacities as Private Attorney General
Representatives,

15 Plaintiffs,

16 v.

17 POSTMATES, INC.,

18 Defendant.

Case No. CGC-18-567868

**DECLARATION OF SHERICKA
VINCENT IN SUPPORT OF
PLAINTIFFS' SUPPLEMENTAL
BRIEFING IN SUPPORT OF CLASS
ACTION SETTLEMENT**

1 I, Shericka Vincent, declare:

2 1. I am the named Plaintiff in the above-captioned lawsuit, and I submit this
3 declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action
4 Settlement.

5 2. I began working as a Postmates driver in and around Alameda County, California from
6 approximately August 2018 to mid-2020.

7 3. During this period, I would usually drive for Postmates five to seven nights a week. On
8 average, I worked 15-25 hours a week for Postmates.

9 4. During this time working for Postmates, I always used my own transportation to make all
10 Postmates delivery. At no point during this time did I receive any reimbursements for my travel
11 related expenses.

12 5. While driving for Postmates, I was paid per delivery. I did not receive an hourly wage.

13 6. In January, 2019, I contacted The Bainer Law Firm, a firm that primarily focuses on
14 wage and hour class-action matters, to discuss employment issues of concern to me relating to
15 the Defendant. The Bainer Law Firm spent considerable time with me going over the issues
16 relating to how Defendant paid its employees. After discussing various options for possible
17 legal action, I decided to seek to address not only my own concerns, but also those of all the
18 other employees who were being treated the same as me. The Bainer Law Firm advised me that
19 in doing this, I would be taking on a commitment to act in the best interests of the group, and
20 that a case such as this could last for years and require substantial work. After considering the
21 options, I decided to take on the role of the representative plaintiff for all of the defendant's
22 employees.
23

24 7. Before suit was filed, I spent a significant amount of time searching for, and subsequently
25 provided my attorney with, all the relevant employment information and documents I could find
26 and I assisted in providing additional information necessary for the preparation of the lawsuit.

27 8. Throughout the litigation, I have always had the best interests of the entire group of
28 employees in mind and I have worked hard on their behalf. This lawsuit has been active for
almost two full years, during which I have continually offered my support. Throughout, I have

1 conferred with my Counsel and remained available to answer any questions, and to provide any
2 work or documents requested. Whenever asked, I have searched for more records, organized
3 and produced records and reviewed any documents provided by Defendants which my attorneys
4 have asked me to explain.

5
6 9. I believe that I have provided considerable time and effort on behalf of all class-members
7 who stand to benefit from the Settlement Agreement. I willingly agreed to participate in this
8 case with no guarantee of personal benefit. By filing this lawsuit, I understood that I would be
9 exposing myself to the risk of retaliation or trouble finding employment as a result of my role in
10 this Action. Given the internet, it is quite likely that future possible employers might find out
11 simply by “googling” my name that I acted as a class representative in this action against a prior
12 employer. I believe that the time, effort, and information I provided to Class Counsel helped to
13 make this Settlement possible.

14 10. I support this Settlement and request that the Court approve the requested incentive
15 award, for my role in this action, in bringing it to fruition, and for assisting in all respects in the
16 case.

17 11. I have not received compensation of any kind in exchange for the general release of my
18 claims against Postmates, other than the proposed service award I would receive as part of this
19 settlement.

20
21 Executed on July 14, 2021, in Oakland, California.

22
23 DocuSigned by:
24 
25 64D475999D9748B
26 _____
27 SHERICKA VINCENT
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