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KRISTIE LOGAN
7

8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF SAN FRANCISCO

10 COORDINATION PROCEEDING SPECIAL
TITLE [RULE 3.550]

CASE NO. CJC-20-005068

11 POSTMATES CLASSIFICATION CASES

CASE NO. CGC-18-567868

12 Included Actions:

13 Winns v. Postmates, Inc., No. CGC-17-562282
14 (San Francisco Superior Court)

**DECLARATION OF STEVEN
ALVARADO IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
REVISED CLASS ACTION
SETTLEMENT**

15 Rimler v. Postmates, Inc., No. CGC-18-
16 567868 (San Francisco Superior Court.)

17 Brown v. Postmates, Inc., No. BC712974
(Los Angeles Superior Court)

Hon. Suzanne R. Bolanos

18 Santana v. Postmates, Inc., No. BC720151
19 (Los Angeles Superior Court)

Dept. 303

20 Vincent v. Postmates, Inc., No. RG19018205
(Alameda County Superior Court)

21 Altounian v. Postmates, Inc., No. CGC-20-
22 584366 (San Francisco Superior Court)

1 **DECLARATION OF STEVEN ALVARADO**

2 I, STEVEN ALVARADO, declare:

- 3 1. I have personal knowledge of the facts set forth in this declaration.
- 4 2. I began working as a Postmates driver in the Los Angeles County, Long Beach California
5 area in September 2015. I stopped working approximately July 2019.
- 6 3. I agreed to serve as a named plaintiff in this case, which bears my name, almost four years
7 ago in November 2017 when my attorneys amended a PAGA letter and the complaint making me as
8 one of named plaintiffs for a representative action under California’s law that allows workers to
9 bring Labor Code claims on behalf of the State.
- 10 4. I was motivated to get involved in this case because I have personally experienced
11 how Postmates underpaid workers like myself by not paying us all earned wages and gratuity by
12 willfully withholding, collecting and/or receiving our base pay for completing deliveries during
13 “batched” orders; withholding from our wages in every pay period that Postmates made a direct
14 deposit into our bank accounts; withholding sums from our gratuity given to or left by customers in
15 every pay period that Postmates made the direct deposit into our bank accounts; and that Postmates
16 willfully accessed our private bank accounts without our authorization.
- 17 5. I wanted to do my part to try to improve earnings conditions for myself and other
18 California couriers for Postmates who has misclassified us as “independent contractors” and
19 paid us per delivery instead of adequate wages.
- 20 6. I also wanted to do my part to improve the terms that were set forth by Postmates by forcing
21 couriers to use direct deposit method of receiving earned wages and gratuities for which we incurred
22 charges.
- 23 7. I wanted to do my part to improve couriers’ earning capacity by requiring Postmates to
24 compensate us for the deliveries we did not wish to complete because we were not compensated for
25 but were forced to complete anyway.
- 26 8. I was determined to put my efforts into this case, because I found it important that Postmates
27 follow the law and pay workers proper wages and reimburse us for our expenses.
- 28 9. I am very concerned about independent contractor misclassification in the
“gig economy” and wanted to do my part to have the workers to receive all benefits and protections
that employees are entitled to have in California.
10. I have taken my role as a class and PAGA representative in this case very seriously
from the outset. As part of my role, I have made sure to be available to my attorneys and their

1 staff by phone and email as much as possible so that I can assist them by providing
2 information about Postmates and spreading the word about the case whenever they need it.

3 11. Throughout this case, I have provided my attorneys with documents and information related
4 to my work for Postmates, including information about Fleet Agreements, screenshots of
5 routes, distances, and time, and how Postmates calculated our wages and payments. I supplemented
6 this information over time.

7 12. I would primarily make deliveries in Los Angeles County, in the city of Long Beach, but also
8 in the Palos Verdes, Redondo Beach, Torrance, Carson, South Bay area and sometimes as far as
9 Sunset Beach, Seal Beach, Huntington Beach and Buena Park in Orange County.

10 13. In addition to providing my attorneys with documents and information regarding my work
11 for Postmates, I also spoke and corresponded regularly with my attorneys and their staff about the
12 case. I estimate that I spent about twenty-five hours in total talking or corresponding with my
13 attorneys and their staff about case updates and settlement negotiations.

14 14. During the early years of litigation of this case, I spoke and corresponded frequently with my
15 attorneys and their staff about the arbitration agreement, opt-out procedures, and timing aspects of
16 adding arbitration clause to the fleet agreement.

17 15. Throughout this litigation, I have feared that by putting myself as the named plaintiff and the
18 representative for this case, I might face difficulties to find work in retaliation for my participation in
19 the case. I was also worried about having my name on this case and how that might affect future
20 employment. I've had these concerns since the case was filed, but I was willing to do it because I
21 thought it was the right thing to do for people who have worked as the couriers for Postmates.

22 16. I got involved in this fight because it matters. It matters when the work, investment, and
23 time Postmates' Couriers put into their jobs is not reflected in their pay. I am proud that this
24 settlement has helped hold Postmates accountable and has allowed all couriers to receive
25 some measure of justice.

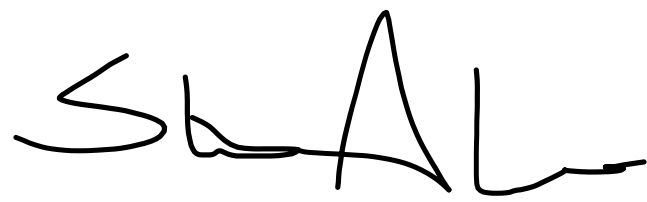
26 17. On a typical day I would work the lunch rush from approximately 11am to 2pm. And then I
27 would work again during the dinner rush from approximately 5pm to 8 or 9pm. Sometimes I'd work
28 less depending on how busy it was. Sometimes I'd work from lunch straight through dinner if it was
really busy. There were evenings that I worked later if it was busy. I mostly worked every day but
sometimes I would take a few days off. There were times when I wouldn't work for weeks once I got
a second job.

18. I drove a Vespa type motor scooter to make all deliveries.

1 19. The types of restaurants I made deliveries for varied a lot from expensive restaurants to fast
2 food restaurants. Some of these deliveries were far from the customer, approximately 15 to 20 miles
3 away.

4 20. I have not received compensation of any kind in exchange for the general release of my
5 claims against Postmates, other than the proposed service award I would receive as part of this
6 settlement.

7 I declare under the penalty of perjury under the laws of the State of California that the foregoing
8 is true and correct to the best of my knowledge. Executed on September 25, 2021, in Long Beach,
9 California.

A handwritten signature in black ink, appearing to read 'S Alvarado', written over a horizontal line.

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11
12 By: _____
13 STEVEN ALVARADO, Declarant

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