

1 SHANNON LISS-RIORDAN (SBN 310719)
sliss@llrlaw.com
2 ANNE KRAMER (SBN 315131)
3 (akramer@llrlaw.com)
LICHTEN & LISS-RIORDAN, P.C.
4 729 Boylston Street, Suite 2000
Boston, MA 02116
5 Telephone: (617) 994-5800
6 Facsimile: (617) 994-5801

7 *Attorneys for Plaintiffs and the Settlement Class*

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

11 COORDINATION PROCEEDING SPECIAL
12 TITLE [RULE 3.550]

CASE NO. CJC-20-005068

13 POSTMATES CLASSIFICATION CASES

CASE NO. CGC-18-567868

14 Included Actions:

**DECLARATION OF GIOVANNI JONES
IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, COSTS, AND
CLASS REPRESENTATIVE SERVICE
ENHANCEMENT**

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

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

Date: November 3, 2021

Time: 2:00 p.m.

Judge: Hon. Suzanne R. Bolanos

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

21 Santana v. Postmates, Inc., No. BC720151
22 (Los Angeles Superior Court)

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

24 Altounian v. Postmates, Inc., No. CGC-20-
25 584366 (San Francisco Superior Court)

1 I, Giovanni Jones, hereby declare and state as follows:

2 1. I have personal knowledge of the facts set forth in this declaration.

3 2. I worked as a Postmates courier in the San Francisco, California and Orange
4 County areas from approximately 2018 until 2019.

5 3. I served as a plaintiff in the class action case, Rimler v. Postmates, Inc., No.
6 CGC-18-567868 (San Francisco Superior Court). The claims in this class case are now being
7 settled as part of a combined class-wide and PAGA settlement in the Rimler/Coordinated case.
8 I joined this case after it was initiated by Jacob Rimler by submitting a PAGA letter to the
9 California Division of Labor Standards Enforcement and then having my name added to the
10 complaint. I understood that as a plaintiff in this case, I would be representing both the interests
11 of the state of California and other Postmates couriers who have been misclassified.
12

13 4. I wanted to join the case because I believe that Postmates, and other similar “gig
14 economy” companies are taking advantage of workers by misclassifying them as independent
15 contractors in order to avoid paying for things like minimum wage, overtime, expense
16 reimbursement for my phone and the car that I use to make deliveries, as well as other rights
17 that employees are typically entitled to in California. I wanted to help couriers like myself get
18 justice.

19 5. Through my work on the case, I provided my attorneys with information relating
20 to my work for Postmates, including how Postmates’s platform works, its pay practices, and its’
21 control over couriers’ day-to-day work. For example, I provided valuable information about the
22 Postmates Application and where several different parts of the App are located in order to
23 determine how noticeable Postmates’s arbitration provision was on its’ platform so that my
24 attorneys could respond to Postmates’s motion to compel my claims to arbitration.

25 6. In addition to providing my attorneys with information regarding my work for
26 Postmates, I also spoke and corresponded regularly with my attorneys and their staff about the
27 case and about settlement negotiations and the court’s decisions. I estimate that I cumulatively
28 spent about 20 hours in total talking with my attorneys and their staff regarding estimates about

1 the case and negotiations with Postmates and reviewing drafts of the settlement agreement.

2 7. I have researched many of the issues that face “gig economy” workers I can
3 better understand the technical aspects of my case and how it relates to all the recent changes in
4 the independent contractor misclassification laws. I have also readily provided information to
5 my attorneys whenever they needed it.

6 8. In total, I estimate that I spent around 50 hours working on this case, including
7 reviewing case materials, sending documents to my attorneys, and discussing and corresponding
8 with my attorneys about the case.

9 9. I was willing to put my name on this case even though I am also concerned about
10 how this might affect prospects with future employers. This is a risk that I have been willing to
11 take because I believe it is so important for Postmates to answer for its violations of the law.

12 10. I have reviewed the settlement agreement. I understand my role as a class
13 representative of the proposed settlement class is to look out for the interests of other Postmates
14 couriers as I would my own and to make sure the settlement is fair, reasonable, and adequate. I
15 have taken that duty very seriously. I have carefully reviewed the settlement materials, and I
16 believe this settlement is fair and reasonable to the settlement class in light of the risks.

17
18
19 I declare under penalty of perjury under the laws of the State of California that the foregoing is
20 true and correct.

21 Executed on September ³⁰____, 2021 in Hollywood, California.

22
23 By: Giovanni Jones
24 Giovanni Jones
25
26
27
28