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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 JACOB RIMLER 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

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

Time: 2:00 p.m.

Judge: Hon. Suzanne R. Bolanos

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)

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DECLARATION OF JACOB RIMLER IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES,
COSTS, AND CLASS REPRESENTATIVE SERVICE ENHANCEMENT

1 I, Jacob Rimler, 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 Pasadena, California, area from
4 approximately 2017 until 2019.

5 3. I served as lead 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 Private Attorneys' General Act (PAGA) settlement
8 in the Rimler/Coordinated case. I initiated this case by submitting a PAGA letter to the
9 California Division of Labor Standards Enforcement, and later by filing the complaint in court.
10

11 4. I brought this case in order to make sure that I couriers like myself are justly
12 compensated for Postmates' violation of the Labor Code in misclassifying its couriers as
13 independent contractors rather than employees.

14 5. I have provided my attorneys with information regarding my work for Postmates,
15 I also spoke and corresponded regularly with my attorneys and their staff about the case and
16 about settlement negotiations. I played a very active role in understanding the terms of the
17 settlement and what it meant for other California Postmates couriers who will benefit from it. I
18 estimate that I cumulatively spent about 10 hours in total talking with my attorneys and their
19 staff regarding estimates about the case and negotiations with Postmates.

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

27 7. As part of my role as a class representative, I have felt that it was my duty to
28 support the case in any way that I can. I have investigated the issues that face "gig economy"

1 workers on my own so I can better understand the technical aspects of my case and how it
2 relates to all of the recent changes in the independent contractor misclassification laws. I have
3 also continued to research and stay apprised of Postmates's practices by following media
4 reports about its business and other litigation against the company, and I have brought these
5 issues to my attorneys' attention. I have also readily provided information to my attorneys
6 whenever they needed it and have assisted in spreading the word about the case.
7

8 8. I have worked tirelessly on behalf of Postmates delivery drivers to make sure we
9 receive what we are owed. In total, I estimate that I have spent approximately 40 hours on this
10 case, including reviewing case materials, sending documents to my attorneys, posting on social
11 media, speaking with other couriers about the case, and discussing and corresponding with my
12 attorneys about the case.

13 9. I have been concerned about potential retaliation from other employers because
14 my name is on this case. However, I've been willing to take the risk because I think that is
15 important that Postmates answer for their misclassification of couriers on a class-wide basis.

16 10. I have reviewed the settlement agreement. I understand my role as a class
17 representative of the proposed settlement class is to look out for the interests of other Postmates
18 couriers as I would my own and to make sure the settlement is fair, reasonable, and adequate. I
19 have taken that duty very seriously. I have carefully reviewed the settlement materials, and I
20 believe this settlement is fair and reasonable to the settlement class in light of the risks.
21

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct.

24 Executed on September ³⁰____, 2021 in oakland, California.
25

26 By: Jacob Rimler
27 Jacob Rimler
28