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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 JOSHUA ALBERT
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.

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

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 JOSHUA ALBERT IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES,
COSTS, AND CLASS REPRESENTATIVE SERVICE ENHANCEMENT

1 I, Joshua Albert, 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 Los Angeles, California, area
4 approximately during the months of May or June 2018.

5 3. I served as a plaintiff in the proposed Private Attorneys General Act (PAGA)
6 case, Albert v. Postmates, Inc., N.D. Cal. Case_No. 3:18-cv-07592-JCS. The claims in this case
7 are now being settled as part of a combined class-wide and PAGA settlement in the
8 Rimler/Coordinated case.

9 4. I was motivated to pursue my case against Postmates because I believe that
10 Postmates takes unfair advantage of its workers and violates California law by not classifying
11 couriers as employees, thereby depriving its workers of minimum wage, overtime, and expense
12 reimbursement. I opted out of Postmates' arbitration provision in order to be able to bring my
13 claims in court.

14 5. In addition to providing my attorneys with information regarding my work for
15 Postmates, I also spoke and corresponded regularly with my attorneys and their staff about the
16 case and about settlement negotiations. I played a very active role in understanding the terms of
17 the settlement and what it meant for other California Postmates couriers who will benefit from it.
18 I 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 and the court's orders.

20 7. I have taken my duty as class representative seriously, and I have carefully
21 reviewed all the settlement papers. I believe that the settlement is a fair and reasonable
22 resolution given the risks and challenges that we would face in continuing to pursue this in court.

23 8. In total, I estimate that I have spent approximately 20 hours on this case,
24 including reviewing case materials, sending documents to my attorneys, and discussing and
25 corresponding with my attorneys about the case.

26 9. I've known all along that the case would have my name on it and I have been
27 concerned about how this might affect prospects with future employers. This is a risk that I
28

1 have been willing to take because I think that is important that Postmates answer for their
2 misclassification of couriers on a class-wide basis.

3 10. I have reviewed the settlement agreement. I understand my role as a class
4 representative of the proposed settlement class is to look out for the interests of other Postmates
5 couriers as I would my own and to make sure the settlement is fair, reasonable, and adequate. I
6 have taken that duty very seriously. I have carefully reviewed the settlement materials, and I
7 believe this settlement is fair and reasonable to the settlement class in light of the risks.
8

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

11 Executed on September³⁰, 2021 in Sacramento, California.
12

13
14 By: 
15 Joshua Albert