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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**

10
11 COORDINATION PROCEEDING SPECIAL
12 TITLE [RULE 3.550]

CASE NO. CJC-20-005068

CASE NO. CGC-18-567868

13 POSTMATES CLASSIFICATION CASES

14 Included Actions:

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

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

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

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

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

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

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

Date: November 3, 2021

Time: 2:00 p.m.

Judge: Hon. Suzanne R. Bolanos

1 I, Dora Lee, 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 Orange County, California, area from
4 approximately June 2, 2017 until on or about February or March 2020.

5 3. I served as a lead plaintiff in the class action case, Lee v. Postmates, Inc., Case
6 No. 3:18-cv-03421-JCS (N.D. Cal.). In that case, my claims were compelled to arbitration after
7 the judge granted Postmates' Motion to Compel Arbitration. I filed an appeal to the Ninth
8 Circuit, which is now stayed pending this settlement. The claims in the class case are now
9 included in the combined class-wide and Private Attorneys' General Act (PAGA) settlement in
10 the Rimler/Coordinated case.

11 4. I decided to bring the class case against Postmates, and other similar "gig
12 economy" companies, related to their unlawful and unfair practices of misclassifying couriers
13 like myself as independent contractors in order to avoid paying for things like minimum wage,
14 overtime, expense reimbursement for the car and phone that I use to make deliveries, as well as
15 other things that employees are typically entitled to in California. I wanted to make sure that
16 couriers like myself are justly compensated through this class action suit.

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

23 6. I spoke and corresponded regularly with my attorneys and their staff about the
24 case and about settlement negotiations. I played a very active role in understanding the terms of
25 the settlement and what it meant for other California Postmates couriers who will benefit from it.
26 I reviewed several versions of the settlement agreement. I estimate that I cumulatively spent
27 about 15 hours in total talking with my attorneys and their staff regarding estimates about the
28

1 case and negotiations with Postmates.

2 7. As part of my role as a class representative, I have felt that it was my duty to
3 support the case in any way that I can. I have researched many of the issues that face “gig
4 economy” workers on my own so I can better understand the technical aspects of my case and
5 how it relates to all of the recent changes in the independent contractor misclassification laws.
6

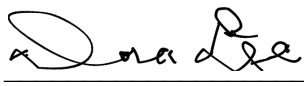
7 8. I have also readily provided information to my attorneys whenever they needed it
8 and have assisted in spreading the word about the case. I estimate that I have spent over 30
9 hours in total researching Postmates and corresponding and speaking with other couriers about
10 the case.

11 9. I’ve known all along that the class action would have my name on it and I have
12 been concerned about how this might affect prospects with future employers. This is a risk that
13 I have been willing to take because I think that is important that Postmates answer for their
14 misclassification of couriers on a class-wide basis.

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

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

23 Executed on October⁵ ____, 2021 in Huntington Beach, California.
24

25 By: 
26 _____
Dora Lee
27
28