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Declaration of Wendy Santana

I, Wendy Santana, declare:

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

2. I began working as a Postmates delivery driver in Los Angeles County in July of 2017. I stopped working for Postmates in approximately December of 2019.

3. I would primarily start by making deliveries in the Hollywood area in Los Angeles County, but I would deliver all around Los Angeles County as well. Often times I would make deliveries in Santa Monica, the Inglewood area, as well as Burbank, Glendale, and Pasadena.

4. On a typical day working for Postmates, I would usually start delivering for Postmates at about 12:00 p.m. I would then be driving and delivering all day and then into the night. I'd stop delivering around 3:00 a.m. in the morning. I worked approximately seven days a week as well, only taking days off for holidays and special occasions. On average, I worked about 80 to 100 hours a week for Postmates.

5. When I worked at Postmates, I drove just one car, a Hyundai Accent. I bought it new through a loan, and my annual car payment was about \$296 a month during the period I worked at Postmates. I ended up putting over 60,000 miles on my car in the two and a half years I drove and delivered for Postmates. Also, I got into an accident while working for Postmates when a motorcyclist crashed into my vehicle, causing about \$5,000 worth of damage to my vehicle.

6. I mainly delivered from restaurants, ranging from very expensive to fast food places. I also sometimes delivered from stores such as Ralphs and Whole Foods. Sometimes deliveries could be far away. For example, if I was delivering from a restaurant in Hollywood out to a place like Pasadena or Santa Monica, it could be about 20 miles away from the restaurant I would pick up from.

7. I was not paid an hourly rate, but per delivery. My base pay per delivery was around \$4.00. When I first started working at Postmates, I also received about \$.80 per mile driven to deliver the item. However, Postmates eventually started lowering the amount I was paid per mile of delivery. If I made multiple deliveries to customers who lived near each other, I would receive a much lower rate of pay because of the close distance of the orders.

1 8. Frequently, I would have to wait in busy restaurants for an order to be ready, as the food
2 would not be prepared when I would arrive. Also, I often found myself stuck in traffic a lot of the times
3 when trying to complete my deliveries. This slowed down the amount of deliveries I could make in a
4 day.

5 9. I sought out attorneys to discuss these issues and hired the Parris Law Firm to represent
6 me. In preparation for my initial communication with my lawyers, I searched for documents and other
7 pertinent information. I spent at least three hours discussing the case with my attorneys.

8 10. After thoroughly discussing the issues with the attorneys, I decided to file a lawsuit against
9 Postmates on behalf of all drivers. During this initial investigatory process, I spent at least eight hours
10 within the first month gathering information from co-workers and discussing the case with my attorneys.

11 11. Since the filing of the initial class and representative action complaint and throughout the
12 length of this case, I have spent a considerable amount of time helping to push it along as the lead named
13 Plaintiff. I spent at least three hours on the telephone with my attorneys providing them information to be
14 included in the complaint and answering any questions that they had regarding my job. The case went on
15 for several years with Postmates fighting all of the claims made in the lawsuit.

16 12. The time that I have spent assisting my attorneys in pursuing this case has been extensive.
17 I spent at least five hours during the first two weeks after my initial discussions with my attorneys speaking
18 further with my attorneys and their staff, going over my experience working at Postmates, why I wanted
19 to pursue a case, and all of the duties that I would have as a class representative.

20 13. Since deciding to pursue a case, I have been in frequent contact with my attorneys and their
21 staff making sure that I was updated on the lawsuit and providing them with any new information that I
22 obtained. I spent at least 10 hours on these activities alone. I also spoke frequently on the telephone with
23 my attorneys to help investigate the case during the first two months of the case. Thereafter, over the
24 course of this case, I spent a total of about ten hours communicating with my attorneys.

25 14. Additionally, throughout the litigation I was repeatedly called by my attorneys to discuss
26 all aspects of the case and the claims, as the litigation developed. I spent approximately three to four hours
27 discussing and answering my attorneys' questions concerning the job duties of the employees, the
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1 employment policies and procedures of Postmates, the names and contact information of former
2 employees, hours worked, and what documents may be available.

3 15. I spent approximately three hours discussing the settlement with my attorneys. Once the
4 settlement was agreed upon, I spent two hours with my attorneys to review and discuss the terms of the
5 settlement documents and this declaration.

6 16. During the entire case, I have been responsive to my attorneys' requests and believe that
7 my efforts in obtaining information were very helpful in obtaining the result that was achieved.
8 Accordingly, I respectfully request that the Court award me, as one of the representatives who filed a
9 lawsuit against Postmates and obtained this settlement on behalf of all of the aggrieved employees, a
10 proposed service award in the amount of \$5,000. As detailed above, I believe that this amount is
11 reasonable considering the time and effort over the last year I have personally spent pursuing this case on
12 behalf of my co-workers and the risks that I undertook in pursuing the case.

13 17. I have signed a general release with Postmates giving up my rights to pursue any and all
14 claims against Postmates as part of this settlement, which is something that the absent employees will not
15 have to do. I believe that the proposed service award in the amount of \$5,000 is fair and reasonable
16 because I am giving up additional rights that the absent employees do not have to give up.

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

20 I declare under the penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct to the best of my knowledge.

22 Executed on 10/5/2021 in Palmdale, California.

23 DocuSigned by:

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26 WENDY SANTANA
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