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## I, Alexander R. Wheeler, declare as follows:

I am an attorney duly licensed to practice before all courts of the State of California and I am a Partner at the Parris Law Firm, attorneys of record for Plaintiff Wendy Santana. The facts set forth in this declaration are within my personal knowledge and, if called as a witness, I could and would competently testify as follows.

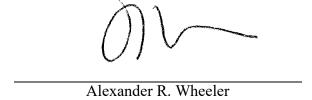
- 1. On September 4, 2018, Plaintiff Santana commenced her action against Postmates based on Postmates' alleged misclassification of its delivery divers as independent contractors. Plaintiff Santana filed a first amended complaint on February 25, 2019. The Parris Law Firm has been actively engaged in the litigation from its inception. The Parris Law Firm has fully and actively participated in every aspect of the litigation process including, but not limited to, discussing the case with the client; conducting legal research; conducting case investigation; participating in case strategy and analysis; drafting, reviewing, and revising pleadings; successfully opposing Postmates' motion to compel arbitration; successfully defeating Postmates' appeal of the court's denial of its motion to compel arbitration; reviewing documents and information; and participating in court appearances.
- 2. The Parris Law Firm is actively involved in both class action and complex litigation matters on an ongoing basis and has certified numerous wage-and-hour class actions in Superior Courts all over California, as well as the United States District Court for the Central, Eastern, and Northern Districts of California. The Parris Law Firm has obtained over a billion dollars in gross settlements and judgments and has handled many dozens of significant wage-and-hour class action cases. Our firm also has extensive experience in appellate practice and has settled numerous class and PAGA actions worth hundreds of millions of dollars on behalf of tens of thousands of California employees. The Parris Law Firm has been court-appointed class counsel in multiple cases in California state and federal courts. Our firm resume, a true and correct copy of which is attached hereto as **Exhibit "1,"** highlights some the firm's wage-and-hour class action experience.

- 3. I have practiced law in Southern California since December of 2005 and have handled numerous and significant class and representative action cases. I am a Partner at the Parris Law Firm and have been practicing class action litigation for nearly 16 years.

  Additionally, the Parris Law Firm also has trial experience in class actions.
- 4. The Parris Law Firm has litigated this case since September 4, 2018, devoting hundreds of hours to obtain an excellent recovery on behalf of the State of California and the Aggrieved Employees. The final total hours worked by the Parris Law Firm is 663.20 hours, with a lodestar of \$531,080 at \$650 per hour. I have reviewed the Parris Law Firm's records and hereby attest that the 663.20 hours attributed to the Parris Law Firm are an accurate representation of the actual time we spent working on the case over the course of this litigation.
- 5. The Parris Law Firm has incurred \$12,301.71 in costs and litigation expenses. This amount includes costs for filing fees and costs to serve all pleadings and motions. These costs were reasonable and necessary in the prosecution of this case.
- 4. The Parris Law Firm does not have any interests that conflict with the class of delivery drivers. The Parris Law Firm has always put the interests of the delivery drivers ahead of its own. The Parris Law Firm is experienced class counsel that will adequately and vigorously represent the interests of the class.

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

Executed this 7th day of October 2021 at Los Angeles, California.



## PARRIS LAW FIRM - SELECTED CLASS ACTION EXPERIENCE

- ➤ Gutierrez vs. State Farm, Los Angeles Superior Court Case No. BC 236552
  - Plaintiffs' counsel in class action seeking overtime compensation for insurance claims adjusters employed by defendant in the State of California. Certification granted, and then summary adjudication as to liability granted in favor of the class. Case settled in 2004 for \$135,000,000.00, with Final Approval granted in Department 309 and no objections filed.
- > Sekly vs. Allstate Insurance Company, Los Angeles Superior Court Case No. BC240813
  - Plaintiffs' counsel in class action seeking overtime compensation for insurance claims adjusters employed by defendant in the State of California. Certification granted, and then summary adjudication as to liability granted in favor of the class. Case settled in 2005 for \$120,000,000.00, with Final Approval granted in Department 309 and no objections filed.
- CNA Class Action Litigation, Los Angeles Superior Court Case No. BC242487, Orange County Superior Court Case No. 01CC08868
  - Plaintiffs' counsel in class action misclassification case seeking overtime compensation for insurance claims adjusters employed by defendant in the State of California. Case settled in 2005 for \$33,000,000.00, with Final Approval granted and no objections filed.
- > Parris v. Lowe's Home Improvement, Los Angeles Superior Court Case No. BC260702
  - Plaintiffs' counsel in class action seeking payment of "off the clock" hours worked by all hourly employees of Lowe's in the State of California. Class certification ordered by the Court of Appeal. Case settled in 2009 for \$29,500,000.00, with Final Approval granted and no objections filed.
- Chavoya v. Southern California Edison Company, Los Angeles County Superior Court Case No. BC366032 and BC425358
  - Plaintiffs' counsel in class action seeking overtime compensation for employees that were reclassified in February 2006 that were not employed at Edison's San Onofre Nuclear Generator facility. Class certification granted, in part, by the trial court. Class was provisionally certified for settlement purposes. Case settled in 2010 for \$29,000,000.00, with Final Approval granted and no objections filed.
- > Roberts vs. Coast National Insurance, Orange County Superior Court Case No 01CC08478
  - Plaintiffs' counsel in class action seeking overtime compensation for insurance claims adjusters employed by defendant in the State of California. Certification granted, and then the matter was tried in biding arbitration. Case settled for in excess of \$18,000,000.00 during arbitration.
- ➤ Dotson vs. Royal Sun Alliance, Orange County Superior Court Case No. 02CC01787
  - Plaintiffs' counsel in class action seeking overtime compensation for insurance claims adjusters employed by defendant in the State of California. Case settled in 2005 for \$12,300,000.00 with Final Approval granted and no objections filed.
- Ingalls v. Hallmark, Central District of California Case Nos. CV08-04342-VBF (Ex) C/W; CV08-05330-VBF (FFMx)
  - Plaintiffs' counsel in class action seeking payment of "off the clock" hours worked by all hourly employees of Hallmark in the State of California. Class was provisionally certified. Case settled in 2009 for \$5,625,000.00, with Final Approval granted and no objections filed.

- > Rodriguez v. Pacific Bell Telephone Company, Los Angeles County Superior Court Case No. BC415309
  - Plaintiffs' counsel in class action seeking overtime compensation for employees employed by defendant in the State of California that were reclassified in May 2009. Class was provisionally certified. Case settled in 2010 for \$5,500,000.00, with Final Approval granted and no objections filed.
- **Kim v. Jamison Services, Inc.**, Los Angeles County Superior Court Case No. BC400414
  - Plaintiffs' counsel in misclassification class action seeking overtime compensation for all salaried, exempt employees (except for high-level management and Receptionists) employed by defendant in the State of California. Class was provisionally certified. Case settled in 2009 for \$2,797,861.24, with Final Approval granted and no objections filed.
- Lippold v. Godiva Chocolatier, Inc., Northern District of California Case No. CV-10-00421-SI
  - Plaintiffs' counsel in misclassification class action seeking overtime compensation for all salaried, exempt Store Managers employed by Godiva in the State of California. Class was provisionally certified. Case settled in 2010 for \$1,000,000.00, with Final Approval granted and no objections filed.
- Additionally, the Parris Law Firm is presently lead plaintiff's counsel in numerous pending consumer and employment class action cases in California, Texas and the District of Columbia. The Parris Law Firm recently obtained a \$370 million defamation verdict, Top Verdict in 2009, in *Marciano v. Fahs, et al.*, in the Los Angeles Superior Court Case No. BC375824.