

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

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

6 1. On September 4, 2018, Plaintiff Santana commenced her action against Postmates
7 based on Postmates' alleged misclassification of its delivery divers as independent contractors.
8 Plaintiff Santana filed a first amended complaint on February 25, 2019. The Parris Law Firm has
9 been actively engaged in the litigation from its inception. The Parris Law Firm has fully and
10 actively participated in every aspect of the litigation process including, but not limited to,
11 discussing the case with the client; conducting legal research; conducting case investigation;
12 participating in case strategy and analysis; drafting, reviewing, and revising pleadings;
13 successfully opposing Postmates' motion to compel arbitration; successfully defeating
14 Postmates' appeal of the court's denial of its motion to compel arbitration; reviewing documents
15 and information; and participating in court appearances.

16 2. The Parris Law Firm is actively involved in both class action and complex
17 litigation matters on an ongoing basis and has certified numerous wage-and-hour class actions in
18 Superior Courts all over California, as well as the United States District Court for the Central,
19 Eastern, and Northern Districts of California. The Parris Law Firm has obtained over a billion
20 dollars in gross settlements and judgments and has handled many dozens of significant wage-
21 and-hour class action cases. Our firm also has extensive experience in appellate practice and has
22 settled numerous class and PAGA actions worth hundreds of millions of dollars on behalf of tens
23 of thousands of California employees. The Parris Law Firm has been court-appointed class
24 counsel in multiple cases in California state and federal courts. Our firm resume, a true and
25 correct copy of which is attached hereto as **Exhibit "1,"** highlights some the firm's wage-and-
26 hour class action experience.

27 ////

28 ////

EXHIBIT "1"

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 binding 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.