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7 Attorneys for Plaintiffs

8  
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF SAN FRANCISCO**

11  
12 JACOB RIMLER, GIOVANNI JONES, DORA  
LEE, KELLYN TIMMERMAN, and JOSHUA  
13 ALBERT on behalf of themselves and others  
similarly situated and in their capacities as Private  
14 Attorney General Representatives,

15 Plaintiffs,

16 v.

17 POSTMATES, INC.,

18 Defendant.

Case No. CGC-18-567868

**DECLARATION OF DORA LEE**

1 I, Dora Lee, declare:

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

3 2. I worked as a Postmates driver in the Orange County from about May 2017 until  
4 November 2018 (but my account is still active).

5 3. On a typical day, I would drive for Postmates from around 8:00 a.m. until 5:00 p.m., with  
6 several breaks throughout the day. I worked approximately three to four days a week. On  
7 average, I have worked 16 to 20 hours a week for Postmates.

8 4. I used my personal car to make deliveries for Postmates.

9 5. The types of restaurant I made deliveries for vary a lot. I would get fancy, high-end  
10 restaurants and some casual and chain restaurants. The range of the deliveries would be 5 to 20  
11 minutes away between the restaurant and the delivery address.


12 6. I was paid per delivery. Postmates would pay me a base rate for picking up the order, for  
13 the time spent doing the delivery, for dropping the delivery off and for mileage. The minimum  
14 pay I would get per delivery was \$4.00 and the maximum I would get is \$7.50. My main source  
15 of income were my tips.

16 7. When I made multiple deliveries from restaurants that were located relatively close  
17 together or to customers who lived close together, I received a lower rate of pay due to the  
18 proximity.

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

22 I declare under the penalty of perjury under the laws of the State of California that the foregoing  
23 is true and correct to the best of my knowledge.  
24

25 Executed on January <sup>14</sup>, 2020, in Orange, California.

26  
27  
28 By:   
DORA LEE