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

10 **FOR THE COUNTY OF SAN FRANCISCO**

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

Plaintiffs,

15 v.

16 POSTMATES, INC.,

17
18 Defendant.

Case No. CGC-18-567868

DECLARATION OF GIOVANNI JONES

1 I, Giovanni Jones, 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 San Francisco and Palo Alto areas from about
4 February 2017 until September 2019.
- 5 3. In addition to the area I usually drove in, I also made deliveries in Cupertino, Los Altos,
6 Los Angeles, Mountain View City, San Jose, San Mateo, and Sunnyvale. In most cases, the
7 application would have me make deliveries between these different cities/counties. It was
8 sometimes the case too that I was visiting another city and would take some order while I was
9 there.
- 10 4. On a typical day, I would drive for Postmates from around 11:00 a.m. until 8:00 p.m. I
11 worked approximately four or five days a week. On average, I have worked 36 to 45 hours a
12 week for Postmates.
- 13 5. I used my personal car to make deliveries for Postmates.
- 14 6. The types of restaurant I made deliveries for vary a lot. I would get fancy, high-end
15 restaurants and some casual and chain restaurants.
- 16 7. I was paid per delivery. Postmates would pay me a base rate for picking up the order, for
17 the time spent doing the delivery, for dropping the delivery off and for mileage. The minimum
18 pay I would get per delivery was \$4.00.
- 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
23 I declare under the penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct to the best of my knowledge.

25
26 Executed on January ¹⁰, 2020, in San Diego County, California.

27
28 By: 
GIOVANNI JONES