

1 SHANNON LISS-RIORDAN (SBN 310719)

sliss@llrlaw.com

2 ANNE KRAMER (SBN 315131)

akramer@llrlaw.com

3 LICHTEN & LISS-RIORDAN, P.C.

4 729 Boylston Street, Suite 2000

Boston, MA 02116

5 Telephone: (617) 994-5800

6 Facsimile: (617) 994-5801

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

15 Plaintiffs,

16 v.

17 POSTMATES, INC.,

18 Defendant.
19
20

Case No. CGC-18-567868

**DECLARATION OF JACOB RIMLER IN
SUPPORT OF PLAINTIFFS'
SUPPLEMNETAL BRIEFING IN
SUPPORT OF CLASS ACTION
SETTLEMENT**

1 I, Jacob Rimler, declare:

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

3 2. I began working as a Postmates driver in the Los Angeles County, California area since
4 September 2017. I stopped working in approximately September 2019.

5 3. I would primarily make deliveries in Los Angeles County, but also did deliveries in
6 Pasadena and Santa Monica approximately once a night. When I was visiting Northern
7 California, I sometimes made deliveries in Berkeley (Alameda County) and Oakland.

8 4. On a typical day, I would drive for Postmates from around 7PM until 10PM-12AM. I
9 worked approximately five nights a week. However, there were some weeks when I didn't drive
10 at all. On average, I have worked 10 to 20 hours a week for Postmates.

11 5. During this time working for Postmates, I leased two cars, a Toyota Prius and a Honda
12 Civic. The Prius I leased from a third-party, but I cancelled the lease because it was too
13 expensive; then, I leased the Honda through Honda. The Honda stopped working about 8 months
14 ago, its transmission broke down. I then transitioned to my mother's car, using her car for
15 working for Postmates. Since I started using her car for doing the deliveries for Postmates, the
16 transmission of her car has died twice, which I've had to replace to keep working.

17 6. The types of restaurant I made deliveries for vary a lot, it goes from fancy restaurants to
18 fast-food restaurants. Some of these deliveries are far, approximately 20-25 miles away from the
19 restaurant.

20 7. I was paid per delivery. When I started working for Postmates, my base pay was around
21 \$4.00 per delivery. On my last deliveries made for Postmates, the base pay rate was
22 approximately \$3.00 per delivery.

23 8. When I made multiple deliveries from restaurants that were located relatively close
24 together or to customers who lived close together, I received a lower rate of pay due to the
25 proximity.

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

Executed on January 10th, 2020, in Pasadena County, California.

By: Jacob Rimler
JACOB RIMLER