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7 Attorneys for Plaintiffs

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

9 **FOR THE COUNTY OF SAN FRANCISCO**

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

14 Plaintiffs,

15 v.

16 POSTMATES, INC.,

17 Defendant.

Case No. CGC-18-567868

DECLARATION OF JOSHUA ALBERT

1 I, Joshua Albert, 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 Los Angeles County, California area in August
4 2018.

5 3. I would primarily make deliveries in the LA area, but also did deliveries in Santa Monica.
6 For a while, I was living in an area between LA and Santa Monica, so my orders would typically
7 come from either LA and Santa Monica (about 50% from each).

8 4. On a typical day, I would drive for Postmates from around 7:00 a.m. until 10:00 p.m. to
9 12:00 a.m. I would sometimes take some breaks throughout the day, 30 minutes to an hour. I
10 worked approximately five to six days a week. There were some weeks that I worked every day
11 (seven days).

12 5. During this time working for Postmates, I owned 2010 Toyota Camry with which I made
13 the deliveries.

14 6. The types of restaurants I made deliveries for varied from fancy restaurants to fast-food
15 restaurants. The distances also varied. On average, it would be 5 to 10 miles, but there were
16 some deliveries that were as far as 20 miles away from the restaurant.

17 7. I was paid per delivery. I don't know what the actual rate is as it varied and because I also
18 received tips from some customers

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 through 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 ¹⁰, 2020, in Pasadena County, California.

26
27
28 By: Joshua Albert
JOSHUA ALBERT