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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 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 KELLYN  
TIMMERMAN**

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1 I, Kellyn Timmerman, declare:

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

3 2. I have worked as a Postmates driver in the San Diego County, California area since on or  
4 about May 25, 2017 until the present date.

5 3. On a typical day, I drive for Postmates from around 11:00 a.m. until 6:00 p.m. I work  
6 approximately seven days a week. On average, I have worked 49 hours a week for Postmates.

7 4. During this time working for Postmates, I have leased two Toyota Prius which I used to  
8 make deliveries.

9 5. The types of restaurants I make deliveries for vary a lot. It was more diverse in the first  
10 year to year and a half, when the restaurants ranged from fast food to 5-star restaurants. During  
11 the last year or so, it is still a range of anything from fast food to larger chains like Tender  
12 Greens and Chipotle and to smaller, local businesses. These would include liquor stores and 7-  
13 Elevens. I have also made “shopping” deliveries from Target, Trader Joe's, Ralphs, and a pet  
14 store, to name a few examples.

15 6. My job consists of picking up (sometimes picking up and paying, and sometimes even  
16 ordering, paying, waiting for the product and picking up). Then I deliver the items to the  
17 customers at their homes, apartments, high-rises, commercial office buildings, hotels, hospitals,  
18 etc.

19 7. I usually accept every order I received but even if I declined it or wanted to decline,  
20 which was my understanding was within my right, Postmates would automatically add that  
21 delivery location and order to my account and if I didn't make the delivery or wanted to cancel,  
22 they would cancel my current orders as well. At the beginning I would only be able to know the  
23 pick-up location of the order but not the drop-off. Afterwards, this changed, letting us know the  
24 close vicinity of the drop-off.

25 8. I am paid per delivery. When I started working for Postmates, my base pay was around  
26 \$4.80 per delivery. Now, my base pay is \$3.00 per delivery because of changes in Postmates'  
27 policies.  
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