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7 *Attorneys for Plaintiffs Jacob Rimler and*
8 *Giovanni Jones, on behalf of themselves and in their*
9 *capacities as Private Attorney General Representatives*

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SAN FRANCISCO**

12 JACOB RIMLER and GIOVANNI JONES, *on*
13 *behalf of themselves and in their capacities as*
14 *Private Attorney General Representatives,*

15 Plaintiffs,

v.

16 POSTMATES, INC.,

17 Defendant.

Case No. CGC-18-567868

DECLARATION OF KADY MATSUZAKI

Assigned For All Purposes to:
Hon. Anne-Christine Massullo
Department 304

Hearing Date: April 29, 2020
Hearing Time: 10:30 a.m.

Complaint Filed: July 5, 2018
TRIAL DATE: NONE

1 I, Kady Matsuzaki, declare as follows:

2 1. I am a paralegal at Lichten & Liss-Riordan, P.C. (LLR) in Boston,
3 Massachusetts. LLR is plaintiffs' counsel in the above-captioned case. I have personal
4 knowledge of the facts set forth in this declaration and, if called as a witness, I could and would
5 competently testify thereto.
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7 2. In December 2019, at the request of attorneys at LLR, I contacted several clients
8 who had previously signed retainers with our firm in which they agreed to be represented in
9 arbitration by LLR for their claims of independent contractor misclassification against
10 Postmates.

11 3. LLR had been notified that these same clients were also purported to be
12 represented by Keller Lenkner for misclassification claims against Postmates.

13 4. I called these clients to clarify what firm they understood to be representing them
14 or if they believed both firms were representing them.

15 5. Many clients I spoke to did not recall having signed up to be represented by
16 Keller Lenkner, and some of these clients signed declarations explaining this.

17 6. Many clients I spoke to recalled having signed up to be represented by Keller
18 Lenkner in addition to LLR, and some of these clients signed declarations to that effect.

19 7. I did not tell any client that they needed to make a choice as to whether they
20 wanted to be represented by LLR or Keller Lenkner or that they were required to sign a
21 declaration in order to be included in the settlement.

22 8. I did not inform clients about any specific terms of the settlement, because I was
23 not asking them to decide whether or not they wanted to participate in the settlement. The
24 purpose of my calls was simply to determine whether the clients were aware that Keller Lenkner
25 claimed to represent them with regard to their misclassification claims against Postmates.
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1 I declare under penalty of perjury under the laws of the state of California that the foregoing is
2 true and correct.

3 Executed this 21st day of April, 2020, in Boston, Massachusetts.
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7 Kady Matsuzaki
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