

1 LAW OFFICES OF TODD M. FRIEDMAN, P.C.
2 TODD M. FRIEDMAN, SBN 216752
tfriedman@toddfllaw.com
3 ADRIAN R. BACON, SBN 280332
abacon@toddfllaw.com
4 21550 Oxnard Street, Suite 780
Woodland Hills, CA 91367
5 Telephone: 877.206.4741
6 Facsimile: 866.633.0228

7 SHANNON LISS-RIORDAN (SBN 310719)
(sliss@llrlaw.com)
8 ANNE KRAMER (SBN 315131)
(akramer@llrlaw.com)
9 LICHTEN & LISS-RIORDAN, P.C.
10 729 Boylston Street, Suite 2000
Boston, MA 02116
11 Telephone: (617) 994-5800
12 Facsimile: (617) 994-5801

13 *Attorneys for Plaintiffs and the Settlement Class*

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF LOS ANGELES**
16

17 DANIEL MARKO, JESUS CORONA, *on*
18 *behalf of themselves and others similarly*
19 *situated and in their capacity as Private*
Attorneys General Representatives,

20 Plaintiffs,

21 v.

22 DOORDASH, INC.,

23 Defendant.
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Case No. BC659841

DECLARATION OF DARNELL AUSTIN

Dept.: 7
Trial Date: None Set
Hon. Amy D. Hogue

Hearing Date: July 12, 2021
Hearing Time: 11:00 am

1 I, Darnell Austin, declare:

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

3 2. I have worked as a DoorDash delivery driver in the Boston, Massachusetts area since on
4 or about May 2016 until March 2020. I stopped because of the Covid-19 pandemic, but my
5 account is still active, and I intend to resume working for them in October 2021.

6 3. I decided to bring claims against DoorDash related to their unfair and unlawful practices
7 in misclassifying drivers and failing to pay minimum wage and overtime and reimburse drivers'
8 expenses because I felt that DoorDash was exploiting me and other drivers. I do think that the
9 changes we are trying to achieve through this case will benefit me and other workers as I plan to
10 resume my work with DoorDash soon.

11 4. Before my case was filed, I worked with my attorneys to determine my pay and expenses
12 and to see if I was making minimum wage. I provided examples of times when DoorDash's pay
13 model caused me to make less than minimum wage. We discussed these documents and the
14 calculations performed by my counsel, and I provided extensive information regarding
15 DoorDash's pay practices and other policies. I estimate I spent approximately 15 hours helping
16 my attorneys investigate my claim and do calculations of damages to identify violations.

17 5. My case was filed as a class action on behalf of Massachusetts drivers. I understood that
18 as a plaintiff in this case, I would be representing DoorDash delivery drivers through
19 Massachusetts who have been misclassified like myself. I estimate I spent approximately 5
20 hours reviewing the Complaint and other court filings in the case, including DoorDash's Motion
21 to Compel arbitration and our response.

22 6. I have taken my role as named plaintiff in this case very seriously from the outset. Since
23 filing my case in September 2017, I have been in regular contact with my attorneys every step of
24 the way, including through the process of responding to DoorDash's Motion to Compel
25 arbitration (and filing our appeal), as well as throughout the settlement process. It has been a
26 long road, spanning four years, but I have stayed engaged throughout that time and have stayed
27 passionate about trying to achieve a good result for the drivers I was trying to represent.
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1 7. I have worked closely with my attorneys, and they have kept me apprised of settlement
2 negotiations. I have reviewed multiple versions of the settlement agreement in this case very
3 carefully. In total, I estimate that I have spent approximately 10 hours reviewing settlement
4 documents and discussing them with counsel.

5 8. In addition to providing my attorneys with documents and information regarding my
6 work for Doordash, I also spoke and corresponded regularly with my attorneys and their staff
7 about conditions on the ground for DoorDash delivery drivers. I estimate that I spent about 10
8 hours in total talking or corresponding with my attorneys and their staff about case updates and
9 developments in the litigation, including other cases and events that impacted our case.

10 9. In total, I estimate that I spent 40 hours working on this case, including reviewing case
11 materials, sending documents to my attorneys, and discussing and corresponding with my
12 attorneys about the case.

13 10. Throughout this litigation, I have feared my retaliation for my participation in the case.
14 Initially, I was still working for DoorDash and relying on that income while my case was
15 ongoing. I was also worried about having my name on this case and how that might affect future
16 employment with other companies. I've had these concerns since the case was filed, but I was
17 willing to do it because I thought it was the right thing to do for people who have worked as
18 DoorDash delivery drivers.

19 11. I have reviewed the settlement agreement. I understand my role as a class representative
20 of the proposed settlement class is to look out for the interests of other DoorDash delivery
21 drivers as I would my own and to make sure the settlement is fair, reasonable, and adequate. I
22 have taken that duty very seriously. I have carefully reviewed the settlement materials, and I
23 believe this settlement is fair and reasonable to the settlement class in light of the risks.
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1 I declare under the penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct to the best of my knowledge.
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4 Executed on September ²⁴____, 2021, in Whitman, Massachusetts.
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7 By: 
8 _____
9 DARNELL AUSTIN
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