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19 *Attorneys for Plaintiffs and the Settlement Class*

20 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

21 **FOR THE COUNTY OF LOS ANGELES**

22 DANIEL MARKO, JESUS CORONA, *on*  
23 *behalf of themselves and others similarly*  
24 *situated and in their capacity as Private*  
25 *Attorneys General Representatives,*

26 Plaintiffs,

27 v.

28 DOORDASH, INC.,

Defendant.

Case No. BC659841

**DECLARATION OF MANUEL MAGANA**

Dept.: 7

Trial Date: None Set

Hon. Amy D. Hogue

Hearing Date: July 12, 2021

Hearing Time: 11:00 am

1 I, Manuel Magana, 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 San Jose County, California area  
4 starting in May 2014 for approximately five years until I was informed via email that my account  
5 was deactivated.

6 3. I decided to bring claims against DoorDash for misclassifying drivers and violating the  
7 Labor Code because I felt that DoorDash was taking advantage of me and other drivers, and help  
8 other drivers who I knew were suffering just like me.

9 4. Before my case was filed, I worked with my attorneys to determine my pay and expenses  
10 and to see if I was making minimum wage. We discussed my documents and I provided  
11 extensive information regarding DoorDash's pay practices and other policies. I estimate I spent  
12 approximately 2 hours helping my attorneys investigate my claim and do calculations of  
13 damages to identify violations.

14 5. My case was filed as a class action. I understood that as the lead plaintiff in this case, I  
15 would be representing the interests of other California DoorDash delivery drivers who have been  
16 misclassified like myself. I estimate I spent approximately 2 hours reviewing the PAGA letter  
17 and Complaint and other court filings.

18 6. I have taken my role as a lead plaintiff in this case seriously. Since filing my case in May  
19 2018, I have worked closely with my attorneys, and they have kept me apprised of settlement  
20 negotiations. I have reviewed multiple drafts of the settlement agreement in this case. In total, I  
21 estimate that I have spent approximately 3 hours reviewing settlement documents and discussing  
22 them with counsel.

23 7. In addition to providing my attorneys with documents and information regarding my  
24 work for Doordash, I also spoke regularly with my attorneys and their staff. I estimate that I  
25 spent about 3 hours in total talking or corresponding with my attorneys and their staff about case  
26 updates and developments in the litigation, including our appeal to the Ninth Circuit Court of  
27 Appeals.  
28

1 8. In total, I estimate that I spent approximately 10 hours working on this case, including  
2 reviewing case materials, sending documents to my attorneys, and discussing and corresponding  
3 with my attorneys about the case.

4 9. Throughout this litigation, I have feared my retaliation for my participation in the case.  
5 Initially, I was still working for DoorDash and relying on that income while my case was  
6 ongoing. I am still not sure if this case had something to do with me being terminated by  
7 DoorDash. I was also worried about having my name on this case and how that might affect  
8 future employment with other companies. I've had these concerns since the case was filed, but I  
9 was willing to do it because I thought it was the right thing to do and a sacrifice worth making  
10 for the good of other DoorDash drivers.

11 10. I have reviewed the settlement agreement. I understand my role as a class representative  
12 of the proposed settlement class is to look out for the interests of other DoorDash delivery  
13 drivers as I would my own and to make sure the settlement is fair, reasonable, and adequate. I  
14 have taken that duty very seriously. I have carefully reviewed the settlement materials, and I  
15 believe this settlement is fair and reasonable to the settlement class in light of the risks.  
16

17  
18 I declare under the penalty of perjury under the laws of the State of California that the foregoing  
19 is true and correct to the best of my knowledge.  
20

21 Executed on September <sup>17</sup>\_\_\_\_, 2021, in San Jose, California.

22  
23 By:   
24 MANUEL MAGANA  
25  
26  
27  
28