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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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25
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27
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Case No. BC659841

DECLARATION OF DAVID CRISTINI

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

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

1 I, David Cristini, 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 Orange County, California area since
4 on or about June 2015 until approximately June 2018.

5 3. I decided to file my lawsuit against DoorDash to address DoorDash's illegal actions in
6 failing to treat me and other Dashers as employees under California law and failing to provide us
7 with the benefits and protections we are entitled to, including minimum wage, overtime, and
8 expense reimbursement. I filed my PAGA letter in May 2018 and joined the case in July 2018.

9 4. Before my case was even filed, I worked closely with my attorneys to determine my pay
10 and expenses and to see if I was making minimum wage. I provided examples of times when
11 DoorDash's pay model caused me to make less than minimum wage to my attorneys. I estimate
12 I spent 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 and a PAGA representative action. I worked with my
15 attorneys to send a letter to the state's enforcement agency about DoorDash's violations of the
16 Labor Code. We later filed a complaint in court. I understood that as a plaintiff in this case, I
17 would be representing both the interests of the state of California as well as the many other
18 California DoorDash delivery drivers who have been misclassified like myself. I estimate I
19 spent approximately 3 hours reviewing the PAGA letter and Complaint and other court filings in
20 the case such as DoorDash's Motion to Compel arbitration and our Motion for Summary
21 Adjudication.

22 6. I have taken my role as plaintiff and PAGA representative in this case very seriously.
23 Since the filing of my case, I have been in regular contact with my attorneys, including through
24 the process of responding to DoorDash's Motion to Compel arbitration, as well as throughout the
25 settlement process. I have shared documents and information with my attorneys regarding my
26 work for DoorDash, including keeping my attorneys apprised of any changes to DoorDash's
27 practices.
28

1 7. I have reviewed several iterations of the settlement agreement in this case in great detail.
2 In total, I estimate that I have spent approximately 10 hours reviewing settlement documents and
3 discussing them with counsel.

4 8. In addition to providing my attorneys with documents and information regarding my
5 work for Doordash, I also spoke and corresponded regularly with my attorneys and their staff
6 about conditions on the ground for DoorDash delivery drivers. I estimate that I spent about 5
7 hours in total talking or corresponding with my attorneys and their staff about case updates and
8 developments in the litigation, including other cases and events that impacted our case (like the
9 passage of AB5 and Proposition 22).

10 9. In total, I estimate that I spent 20 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. I have reviewed the settlement agreement. I understand my role as a class representative
14 of the proposed settlement class is to look out for the interests of other DoorDash delivery
15 drivers as I would my own and to make sure the settlement is fair, reasonable, and adequate. I
16 have taken that duty very seriously. I have carefully reviewed the settlement materials, and I
17 believe this settlement is fair and reasonable to the settlement class in light of the risks.

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

22
23 Executed on September ^{17th} ___, 2021, in Westminster, California.

24
25 By: David Cristini
26 DAVID CRISTINI
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