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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**

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.

Case No. BC659841

DECLARATION OF JARED ROUSSEL

Dept.: 7

Trial Date: None Set

Hon. Amy D. Hogue

Hearing Date: July 12, 2021

Hearing Time: 11:00 am

1 I, Jared Roussel, 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 Francisco County, California
4 area since on or about May 2018 until November or December 2019 (this was when I made my
5 last delivery, but my account is still active so I can resume making deliveries at any time).

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, and I wanted to take
9 a stand. I opted out of DoorDash's arbitration clause, and I believed that this fact would make
10 me well-positioned to bring forward claims on behalf of other drivers and have a positive impact.

11 4. Before my case was even filed, I worked closely with my attorneys to determine my pay
12 and expenses and to see if I was making minimum wage. I provided examples of times when
13 DoorDash's pay model caused me to make less than minimum wage, sifting through statements,
14 transcribing the wage data and time worked, and organizing it for my attorneys. We discussed
15 these documents and the calculations performed by my counsel, and I provided extensive
16 information regarding DoorDash's pay practices and other policies. I estimate I spent
17 approximately 6 hours helping my attorneys investigate my claim and do calculations of
18 damages to identify violations.

19 5. My case was filed as a class action and a PAGA representative action. I worked with my
20 attorneys to send a letter to the state's enforcement agency about DoorDash's violations of the
21 Labor Code. We later filed a complaint in court. I understood that as the lead plaintiff in this
22 case, I would be representing both the interests of the state of California as well as the many
23 other California DoorDash delivery drivers who have been misclassified like myself. I estimate I
24 spent approximately 2 hours reviewing the PAGA letter and Complaint and other court filings in
25 the case.

26 6. I have taken my role as a lead plaintiff and PAGA representative in this case very
27 seriously from the outset. Since filing my case in January 2019, I have worked closely with my
28 attorneys, and they have kept me up to date about the settlement negotiations. I have reviewed

1 several iterations of the settlement agreement in this case in great detail. In total, I estimate that I
2 have spent approximately 24.5 hours reviewing settlement documents and discussing them with
3 counsel.

4 7. 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 14
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 8. In total, I estimate that I spent 46.5 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 9. Throughout this litigation, I have been worried about having my name on this case and
14 how that might affect future employment with other companies. I was willing to go forward
15 anyway because I thought it was the right thing to do for people who have worked as DoorDash
16 delivery drivers.

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

22
23
24 I declare under the penalty of perjury under the laws of the State of California that the foregoing
25 is true and correct to the best of my knowledge.

26
27 Executed on September²⁴ ___, 2021, in San Francisco, California.

28
By: Jared Roussel
JARED ROUSSEL