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

20 Plaintiffs,

v.

21 DOORDASH, INC.,

22 Defendant.

Case No. BC659841

DECLARATION OF BRANDON
CAMPBELL IN SUPPORT OF MOTION
FOR ATTORNEYS' FEES AND COSTS

Dept.: 7

Trial Date: None Set

Hon. Amy D. Hogue

Hearing Date: November 30, 2021

Hearing Time: 9:30 am

DECLARATION OF BRANDON CAMPBELL

I, Brandon Campbell, declare that:

1. I am over eighteen years old and a resident of Riverside, California. I make this declaration based on my personal knowledge. If called to testify, I could and would testify to the facts contained herein.

2. I worked as a delivery driver making food deliveries to customers of DoorDash, Inc. (“DoorDash”) in the State of California. DoorDash paid me a minimum-pay guarantee for each delivery. However, DoorDash used the tips that I earned towards the minimum-pay guarantee it owed me instead of paying me the full tip.

3. I sought out attorneys to discuss these issues and hired the attorneys at the Parris Law Firm.

4. After thoroughly discussing the issues with my attorneys, I decided to file a lawsuit against DoorDash.

5. I understand that a class action is a lawsuit that is brought on behalf of other fellow delivery drivers, which means that I represent them. This means that I take full responsibility to prosecute this case on everyone’s behalf. I understand that I am responsible for bringing this case to trial, appearing in court, and working with my attorneys on behalf of the absent class members. I understand the obligations of being an adequate class representative and have been actively involved in this litigation as specifically detailed below, and will continue to take on the substantial burden in order to represent the class in this case. This means that I will not put my personal interests in front of my fellow delivery drivers and that I owe a fiduciary duty to them throughout this lawsuit and that I will keep them updated on the status of this case.

6. My interests as a Plaintiff in this case are not adverse to the interests of the other delivery drivers. I do not have any conflicts with any of the other delivery drivers at DoorDash, and I never intend to. I also do not see any conflicting interests arising in the future. I understand how important it is for me not to jeopardize their interests in this case because it is a class action, and not just my individual case. I brought this case so I could help the other delivery drivers correct the legal wrongs

1 I believe DoorDash committed. If I did not think that I could help my fellow delivery drivers
2 adequately, I would not have taken the lead on this case.

3 7. I have always put the best interests of the other delivery drivers first while performing
4 my duties as a potential leader in this case. I have been committed to strongly fighting this case on
5 behalf of myself and the other delivery drivers. I have been in contact with my attorneys to stay updated
6 on what is going on in this case, to answer any questions about my experience working for DoorDash,
7 and to search for documents and information. I believe I have shown my willingness to pursue the
8 interests of the other delivery drivers by starting a lawsuit on their behalf and by helping my attorneys
9 with their investigation in this case.

10 8. I seek to be a representative for the class in this lawsuit. After fully discussing this role
11 with my attorneys, I understand that I:

- 12 a. represent the interests of all members of the class in the case;
- 13 b. have claims that are similar to those of the class and have been harmed by
14 the same acts by DoorDash;
- 15 c. consider the interests of the class just as they would consider their own
16 interests and in some cases must put the interests of the class before their
17 own interests;
- 18 d. actively participate in the lawsuit, as necessary, by, among other things,
19 answering questions, producing documents to DoorDash, and giving trial
20 testimony if required;
- 21 e. may be required to travel to give such testimony;
- 22 f. recognize and accept that any resolution of the lawsuit, by dismissal or
23 settlement, is subject to court approval, and must be designed in the best
24 interest of the group as a whole;
- 25 g. am not required to be particularly sophisticated or knowledgeable about the
26 subject of the lawsuit;
- 27 h. should follow the progress of the lawsuit and should provide all relevant
28 facts to the lawyers for the class; and

i. volunteer to represent and fight for many other people with similar claims and injuries because of the importance of the case and the need that all class members benefit from the lawsuit equally, and as a result, the savings of time, money and effort should benefit all parties and the court.

9. To date, I have performed several tasks in my role as a class leader, including:

- a. seeking out and meeting with my attorneys to discuss the facts of the case;
- b. reviewing documents;
- c. searching for documents and information; and
- d. keeping in contact with my lawyers regarding the status of the lawsuit and providing my counsel with any information or documents they request.

10. It is my understanding that the class members are positioned similarly on the issues in this case and their experiences with DoorDash’s common policies and practices. I have always believed this, which is what made me seek out class action lawyers to help me with this case.

11. Throughout the length of this case, I have spent time helping to push it along as the lead named Plaintiff.

12. I confirm that I have given written approval that attorneys’ fees approved by the Court as part of the Class Action Settlement Agreement and Release will be divided as follows: 41% of the fee award, less \$40,000, will be paid to the Law Offices of Todd M. Friedman P.C. with 10% to be shared with Michael J. Hassen of Reallaw APC; 46% of the fee award will be paid to Lichten & Liss-Riordan, P.C.; 3% of the fee award will be paid to Capstone Law APC; 4% of the fee award will be paid to Aegis Law Firm PC; 4% of the fee award will be paid to The Graves Firm APC; 2% of the fee award will be paid to the Parris Law Firm; and \$40,000 will be paid to Abye Law Offices.

13. I have not entered into any undisclosed agreements nor have I received any undisclosed compensation in this case. The only compensation I will receive is whatever the amount is awarded by the Court to me as a Service Award, as well as my share as a class member of the settlement fund.

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14. I am not related to any of the other Plaintiffs or anyone associated with any of the Plaintiffs' Counsel.

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

Executed on 6/6/2021 at Riverside, California.

DocuSigned by:

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Brandon Campbell