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13 *Attorneys for Plaintiffs*

14
15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF LOS ANGELES**
17

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

21 Plaintiffs,
22 v.

23 DOORDASH, INC.,

24 Defendant.
25
26

Case No. BC659841

**DECLARATION OF JESUS CORONA IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL AND
INCENTIVE AWARD**

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

Hearing Date: November 30, 2021
Hearing Time: 9:30 am

1 I, Jesus Corona, declare:
2

- 3 1. I am one of the named plaintiffs in this action. I have personal knowledge of the following
4 facts and, if called upon as a witness, could and would competently testify thereto, except as
5 to those matters which are explicitly set forth as based upon my information and belief and,
6 as to such matters, I am informed and believe they are true and correct.
7
- 8 2. I am writing this declaration in support of Plaintiffs' Motion for Final Approval and Motion
9 for Fees Costs and Incentive Award in the above-captioned action.
10
- 11 3. In my declaration in support of Plaintiffs' Motion for Preliminary Approval, I explained
12 why I believe that this settlement is a fair and reasonable result for the Class.
13
- 14 4. The adequate notice and positive response of the Class reinforces my position during
15 preliminary approval that this Settlement Agreement is one that is fair and reasonable to the
16 Class and that I have acted as an adequate representative.
17
- 18 5. After being informed by my attorneys of my responsibilities as a class representative, I
19 believe that I put the interests of the class members before my own and will continue to do
20 so. Throughout this case, I believe that I served as an adequate class representative.
21
- 22 6. I knew that by filing the class action complaint, I might have an obligation for some or all of
23 Defendant's legal costs if the case was not successfully litigated. Even knowing the pitfalls,
24 I was not scared to stand up for what I believe is right, however, I was concerned about the
25 possibility of losing and having a judgment filed against me for costs if we lost the case.
26
- 27 7. During the pendency of the litigation, I spent considerable time searching for documentation
28 relating to the class action and also reviewing documents and settlement papers. I worked
extensively to assist with the lawsuit, and by providing documentation, correspondence
between myself and Defendant, I had many conversations with the attorneys at The Law

1 Offices of Todd M. Friedman, P.C, including with Todd Friedman, Adrian Bacon, and
2 several staff members regarding the case and the strength of the claims we alleged in the
3 Complaint. All in all, I have spent approximately 60 hours on this litigation.
4

5 8. I stayed in touch with my attorneys, by phone and email on a regular basis, and was fully
6 aware of all significant developments in the case as I took the duty and privilege of acting as
7 a Class Representative in this case very seriously. Throughout the life of this case, I have
8 had dozens calls with my attorneys and have exchanged several dozen emails as well. I
9 worked with my attorneys throughout the case, assisting in drafting the complaint by
10 providing information and documentation to support the claims. I also regularly discussed
11 the case with my attorneys when they had questions, and also participated in person the
12 mediation and stayed overnight, along speaking with my attorneys about the status of
13 settlement discussions. I was therefore very much involved in the settlement process,
14 consulting with my attorneys on the facts and terms relevant to the settlement, and
15 reviewing and signing the settlement documents once we reached a deal.
16
17

18 9. I was intimately involved with the class action lawsuit performing the duties discussed
19 above. While I didn't keep accurate time records, I was in regular contact with my attorneys
20 regarding the status of the case and ways in which I could help move the case towards
21 settlement. I expended considerable time on the issues presented during the litigation and in
22 the settlement process and took a substantial risk that was not taken by other members of the
23 Class.
24

25 10. I have agreed to a class settlement in this case with Defendant. I have reviewed the
26 Complaint, the Settlement Agreement, and other related materials, and have discussed their
27 contents with my attorneys.
28

11. I believe that the settlement achieved is a fair result for the Class, and is fair and reasonable,
considering the potential risks of going forward with litigation, especially in light of some of

1 the defenses that Defendant has raised with regards to its defenses to certifying the case as a
2 class action, and its arguments regarding its courses being of some value to the consumers.
3 While I disagree with these defenses, I recognize that the Court or a Jury may find them
4 compelling. In determining that this Settlement is fair and reasonable, I considered these
5 defenses, and listened to the advice of my counsel, in giving them due weight.
6

7 12. The settlement achieved was for a total sum of \$100,000,000. I am aware that this amount
8 is potentially a greater amount of money than the Class Members would receive if we won
9 the case. In light of the serious risks of going forward with this case, the chance that we did
10 not win on class certification, the likelihood of appeals, the potential for lengthy delay, and
11 the ultimate uncertainty of recovery through litigation of the claims brought under
12 employment laws, I believe the settlement is fair and reasonable and represents a fair result
13 for Class Members.
14

15 13. I understand that by settling this case, both Parties were able to avoid costly and time
16 consuming additional litigation and trial.
17

18 14. To my knowledge, I have no interest that is not in line with the class members. My goal in
19 bringing this case was to ensure that Defendant was made aware of the requirements under
20 the law, and that I could achieve a fair result for the Class Members who I believed were
21 affected by the policies and practices that affected me. I believe that both of these goals
22 have been achieved by this settlement, and I am proud to have been a part of it.
23

24 15. I respectfully request the Court approve the Motion for Final Approval and Motion for
25 Attorneys' Fees, Costs and Incentive Award.
26

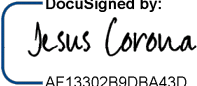
27 16. I do not have any conflicts of interest with any other members of the Class.

28 17. I have not received compensation of any kind in exchange for the general release of my
claims against DoorDash other than the proposed service award I would receive as part of this
settlement.

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

Executed on September 22, 2021, in Los Angeles, California.

By:  AF13302B9DBA43D...
JESUS CORONA