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12 Attorneys for Plaintiff
13 Kevin Saunders

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA

15 COUNTY OF LOS ANGELES

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

21 Plaintiffs,

22 v.

23 DOORDASH, INC.,

24 Defendants.

CASE NO.: BC659841

**DECLARATION OF KEVIN
SAUNDERS IN SUPPORT OF
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Hearing Date: November 30, 2021

Time: 9:30 a.m.

Dept.: 7

Judge: Hon. Amy D. Hogue

1 I, Kevin Saunders declare:

2 1. I am a competent adult, over the age of eighteen and the Plaintiff in the
3 above-referenced action (“*Marko*”), and in the matters of *Saunders v. DoorDash, Inc.*,
4 Case No. CGC-20-585467 filed in San Francisco Superior Court (“*Saunders Class*
5 *Action*”) and *Saunders v. DoorDash, Inc.*, Case No. CGC-20-587051 filed in San
6 Francisco Superior Court (“*Saunders PAGA*”). The following is based upon my personal
7 knowledge and, if called as a witness, I could and would competently testify thereto.

8 2. I am familiar with the work involved in prosecuting the *Saunders Class*
9 *Action* and the *Saunders PAGA* (collectively “*Saunders Actions*”) against Defendants.
10 I have participated in all stages of this litigation and have had numerous in-person and
11 telephone meetings with my attorneys. My participation in this lawsuit also included
12 reviewing a large number of documents and pleadings.

13 3. I worked as a delivery driver for DoorDash Inc. starting in June 2020.

14 4. I knew that being involved in litigation against my employer would make it
15 hard for me to find employment, but I chose to proceed anyway because I thought it was
16 the right thing to do. I know the fact that I sued an employer is public and I will always
17 have to deal with that whenever I seek employment.

18 5. At the beginning of the year, I found out that I am covered by the settlement
19 related to the claims in *Marko*. I understand that the settlement in this case originally
20 covered a shorter period of time that did not include my lawsuit, but the parties changed it
21 to expand the time period, and the revised settlement overlapped with the time periods
22 covered by my own lawsuits.

23 6. When I first learned about the settlement, I read the proposed settlement and
24 talked to my attorney about it.

25 7. I initially had concerns about the settlement. For example, the settlement
26 originally did not provide any premium for people like me who had opted out of
27 arbitration and therefore had the ability to bring our claims in court.
28

1 8. Before I agreed to the settlement I insisted on changes including a provision
2 that provided larger payments for drivers like me who had opted out of arbitration.

3 9. Throughout this process, I have spent time reviewing documents and
4 information, obtaining documents and information for my attorney and communicating
5 with my attorney. For example, when I first filed my class action case, the Defendant
6 removed the case to federal court. After that happened, I worked to provide my attorney
7 with screenshots and other information that showed how DoorDash collected information
8 regarding people's addresses, driver's licenses, and vehicle registration. I understand this
9 information was important in getting the case back to state court. I also spent a great deal
10 of time reviewing the multiple versions of the settlement as described above.

11 10. I understand that as a class representative, I am responsible to the class by
12 looking out for their interests. Throughout the two *Saunders* actions and, more recently,
13 the *Marko* action, I have taken an active role, working to understand all of the issues in
14 the cases for myself and for other Class Members. In making decisions about the
15 lawsuits, I have tried to put myself in the position of other Class Members and look at
16 what would be best for all of my fellow Class Members.

17 11. I also understand that as a class representative, I must work to ensure that
18 the settlement is fair, adequate, and reasonable. Accordingly, I worked closely with my
19 attorneys, through multiple conversations, to consider the terms of the settlement and
20 whether they were in the best interests of the Class.

21 12. Based on everything I know about the case, I feel that the settlement, now
22 that it has been modified to address my concerns, is fair, reasonable, and in the best
23 interests of the Class. In particular, I think receiving monetary compensation sooner and
24 avoiding the delay and risk that would be required by going to trial is very valuable to the
25 employees in the Class.

26 13. At the time of preliminary approval, I estimated that I had spent 50 hours on
27 the two *Saunders* actions and *Marko*. This includes reviewing documents, providing
28 relevant information to my attorneys, keeping apprised of developments in the cases, and

1 discussing important issues and decisions in the matter with my attorneys. Since then, I
2 have continued to follow this matter closely including communicating with my attorney
3 and reviewing the orders in this case. Including the time that I spent on this statement, I
4 estimate that I have now spent more than 53 hours on these matters.

5 14. I am unaware of any actual or potential conflict between myself and other
6 Class Members or anyone else who has driven for DoorDash, Inc. in California.

7 15. Other than my work as a driver, I have never been an employee of
8 DoorDash, Inc. and I have no other relationship or connection to the company. As far as
9 I know, I have not had any business dealings or other interactions with any other
10 DoorDash drivers that could create a conflict of interest.

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12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct. Executed September 22, 2021, at Mesa, Arizona.

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15 _____
16 KEVIN SAUNDERS
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