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SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

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

Plaintiffs,

v.
DOORDASH, INC.,

Defendant.

Case No. CGC-18-567869

**DECLARATION OF MILOS ANTIC IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

1 I, Mikael A. Abye, declare:

2 1. I represent class member plaintiff Milos Antic. I am admitted to practice law
3 in California. I make these statements based on personal knowledge and would so testify if
4 called as a witness.

5 2. This declaration is submitted in support of Plaintiffs' Motion for Order
6 Granting Final Approval of Proposed Class Action Settlement and Attorneys' fees and costs.

7 3. Mr. Antic engaged me to represent him in November 2020. Mr. Antic had
8 concerns with the then-proposed class action settlement and wanted more information about
9 the case and his options.

10 4. On behalf of Mr. Antic, I investigated the matter. That investigation included
11 gathering information from Mr. Antic and his work for DoorDash, researching the legal
12 issues, reviewing relevant publicly available court and regulatory filings concerning
13 DoorDash, and reporting findings to my client.

14 5. Mr. Antic believes that DoorDash misclassified him as an independent
15 contractor and failed to comply with employment law requirements of California law.

16 6. Additionally, I prepared and submitted several court filing on behalf of
17 Mr. Antic, starting with objections to the then-proposed class action settlement, which I filed
18 on November 17, 2020.

19 7. On December 28, 2020, I filed a motion to intervene in the *Marciano*
20 *v. DoorDash* matter (Case No. CGC-18-567869, San Francisco Superior Court). That filing
21 included a draft complaint prepared on behalf of Mr. Antic.

22 8. Prior to the motion to intervene was adjudicated, on behalf of Mr. Antic, I
23 entered into discussions with class counsel regarding Mr. Antic's concerns. Those discussions
24 resulted in Mr. Antic withdrawing his motion to intervene and joining the settlement class. In
25 addition, I entered into a joint prosecution agreement with The Law Offices of Todd M.
26 Friedman ("Friedman") whereby we agreed to work together and to split any net amount of
27 attorney's fees awarded Friedman in the matter of *Cynthia Marciano and David Cristini v*
28 *Doordash, Inc.* Case No. CGC-18-567869. My portion of that split is to be \$40,000. I have

1 received written confirmation from Mr. Antic that he approves of my fee splitting agreement
2 with Friedman.

3 9. Subsequent to joining the class, I have reviewed and advised Mr. Antic with
4 respect to the various iterations of the settlement documents and have provided him with
5 updates as the case's status. I believe that the Settlement is fair and reasonable and provides
6 significant meaningful relief to Class Members

7 10. Mr. Antic is adequate to represent the Class. He and Class Members have
8 strong and co-extensive interests in this litigation because they all worked for Defendant
9 during the relevant time period, suffered the same alleged injuries from the same alleged
10 course of conduct, and there is no evidence of any conflict of interest between Mr. Antic and
11 Class Members. Mr. Antic has also demonstrated his commitment to the Class by, among
12 other things, retaining me as counsel, providing me with documents, extensively speaking
13 with me to assist in identifying the claims asserted in this case. Neither Mr. Antic nor I have
14 any conflicts of interests with the Class.

15 11. This Court should approve the proposed Incentive Award for Mr. Antic. He
16 has advanced the interests of the Class by, among other things, speaking extensively with
17 counsel on numerous occasions to help identify and develop the claims in this case, providing
18 documents pertinent to the claims of the Class Members, participating in settlement
19 discussions, and carefully reviewing the Settlement and related documents. Further,
20 Mr. Antic took the personal risk of potentially facing intrusive discovery and disclosure to
21 future employers that he sued a former employer after years of employment.

22 12. It is my understanding that for purposes of settlement, Defendant does not
23 contest, the award of attorneys' fees requested is reasonable.

24 Experience

25 13. I have practiced law in California since December of 2004 and have
26 represented clients in connection with a number of significant class action cases, including.

27 a) *In Re Celera Corporation Sec. Litig.*, N.D. Cal, Case No.: 5:10cv2604

28 b) *Philco Investments, Ltd., et al. v. Martin, et al.*, N.D. Cal, Case No.: 3:10cv2785

- 1 c) *Altaflo, LLC v. Dun & Bradstreet Credibility Corp.*, W.D. Wash., Case No.:
- 2 2:14cv1288
- 3 d) *Malaney, et al. v. Ual Corp., et al.*, N.D. Cal, Case No. 3:10cv2858
- 4 e) *Die-Mension Corporation v. Dun & Bradstreet Credibility Corp. et al.*, W.D. Wash.,
- 5 Case No.: 2:14cv855
- 6 f) *Flow Sciences, Inc. v. Dun & Bradstreet, Inc. et al.*, W.D. Wash., Case No.:
- 7 2:14cv1404.
- 8 g) *O&R Construction, LLC v. Dun & Bradstreet Credibility Corp., et al.*, W.D. Wash.,
- 9 Case No.: 2:12cv2184
- 10 h) *Vinotemp International Corp. et al. v. Dun & Bradstreet Credibility Corp., et al.*, C.D.
- 11 Cal., Case No.: 8:14cv451
- 12 i) *Stewart v. GoGo, Inc.*, N.D. Cal, Case No.: 3:12cv5164

13 14. My billing rate is \$565/hour. That rate was recently approved by Hon. Richard

14 Fruin in *GemCap v. Mann*, Los Angeles Superior Court, Case No. BC693646.

15 15. This action required me to spend time litigating that could have been spent on

16 other matters. At various times, this class action has consumed my time and resources. I have

17 not been paid anything for my work on this case since I was hired. To date, I have advanced

18 \$1,642.80 in costs for this litigation. I believe that lawyers in such a position expect to

19 receive a multiplier in these types of cases due to the inherent risk, the extent to which the

20 action precludes work on other cases, the delayed compensation for fees and the costs I have

21 had to advance.

22 16. I have maintained contemporaneous time records since this action commenced.

23 To date, I have spent 62.5 hours on this case, and anticipate spending additional time on it

24 relating to the judgment and final distribution.

25 I declare under penalty of perjury under the laws of the State of California that the

26 foregoing is true and correct.

27 Executed this 22nd day of September, 2021, at Berkeley, California.

28 _____
Mikael A. Abye