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10 *Attorneys for Plaintiffs*

11 *and the Settlement Class*

12
13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF LOS ANGELES**

15 ROBINA CONTRERAS, GABRIEL ETS-
16 HOKIN,

17 Plaintiffs,

18 v.

19 ZŪM SERVICES, INC.,

20 Defendant.

**DECLARATION OF ROBINA
CONTRERAS**

1 I, Robina Contreras, declare:

2 1. I have personal knowledge of the facts set forth in this declaration.

3 2. I began working at Zūm as a driver in the California area in approximately October of
4 2018. I worked 15-20 hours a week. I stopped driving for Zūm in approximately December
5 2019, because I began work as a full-time employee elsewhere.

6 3. I agreed to serve as a named plaintiff in this case in August of 2019. It has now been
7 approximately two and a half years that I have been involved in this litigation, helping to bring
8 claims on behalf of California drivers providing transportation services to Zūm.

9 4. I was motivated to contact an attorney and get involved in this case because I had been
10 reading and educating myself on how gig economy companies such as Uber, Lyft, and Zūm, had
11 been using the independent contractor to exploit workers (by minimizing pay, while still
12 controlling these workers). Based on the control exerted by Zūm, I realized I was misclassified
13 as an independent contractor. For example, while working for Zūm, I would be frustrated that I
14 would be told to pick up a passenger at a specific time and would wait 20-25 minutes and then
15 would only learn, after waiting that period of time, through Zūm that the passenger had cancelled
16 the ride earlier that morning. While I would receive some form of cancellation fee, I was
17 ultimately losing money due to wait time and because the cancelation could have a cascading
18 effect on my schedule for the rest of the day.

19 5. Throughout this case, I have provided my attorneys with information relating to my work
20 for Zūm. In addition to providing my attorneys with information regarding my work for Zūm, I
21 also spoke and corresponded with my attorneys regarding the settlement efforts in this case. My
22 attorneys have kept me apprised of settlement negotiations in this case, and I have reviewed the
23 settlement agreement. I understand my role as a class representative of the proposed settlement
24 class is to look out for the interests of other California Zūm drivers and I have taken that duty
25 seriously. I have carefully reviewed the settlement materials, and I believe this settlement is in
26 the best interests of the settlement class.

27 6. Cumulatively, I estimate I spent at least 10-15 hours speaking to my attorneys about my
28 work and the case and going over the settlement terms.

1 7. As I was working for Zūm at the beginning of this case, I feared retaliation for my
2 participation in the case. I was also worried about having my name on this case and how that
3 might affect future employment. I've had these concerns since the case was filed, but I was
4 willing to do it anyway because I wanted to make a difference for my fellow drivers and to
5 challenge the independent contractor model that Zūm and other gig economy companies have
6 been using.

7
8 8. I am very proud of my involvement in this litigation and am proud to lend my name to
9 this settlement. I joined this litigation because companies like Zūm should not be allowed to get
10 away with unlawfully exerting control over workers who they have classified as independent
11 contractors, creating a horribly stressful and unfair work environment, while at the same time
12 depriving those workers of their employee rights. I have been willing to lend my good name to
13 this case because I think it's important to stand up for your beliefs, even if it means taking a risk
14 to my personal interests and reputation.

15
16 I declare under the penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct to the best of my knowledge.

18
19 Executed on February ²¹ ____, 2022, in ^{Buena park} _____, California.

20
21 By: Robina Contreras
22 Robina Contreras