

1 THE GRAVES FIRM
2 ALLEN GRAVES (SB#204580)
3 E-mail: allen@gravesfirm.com
4 ADRIAN HERNANDEZ (SB#325532)
5 E-mail: adrian@gravesfirm.com
6 122 N. Baldwin Ave., Main Floor
7 Sierra Madre, CA 91024
8 Telephone: (626) 240-0575
9 Facsimile: (626) 737-7013

10 Attorneys for Plaintiff
11 Malachi Maynard

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF ALAMEDA

14 Malachi Maynard, in his individual and
15 representative capacity,

16 Plaintiff,

17 v.

18 TaskRabbit, Inc., IKEA North America
19 Services, LLC, IKEA US Retail LLC.
20 and DOES 1 through 10, inclusive,

21 Defendant.

CASE NO.: 21CV003513

**DECLARATION OF ALLEN
GRAVES IN SUPPORT OF
MOTION FOR APPROVAL OF
INDIVIDUAL PAGA SETTLEMENT**

Date: June 11, 2024

Time: 10:00 AM

Dept: 23

Judge: Hon. Michael Markman

Reservation ID: 054023893728

1 I, Allen Graves, declare:

2 1. I am counsel of record for Plaintiff Malachi Maynard in the above-captioned
3 matter. I am licensed to practice law in the State of California and before this Court.
4 I have personal knowledge of the facts herein.

5 2. Plaintiff Maynard filed a representative action against Defendant based on
6 the Private Attorney General Act ("PAGA") in this Court on December 3, 2021,
7 Case No. 21CV003513 ("Maynard PAGA Case"). The PAGA case is based on the
8 alleged misclassification of individuals who are engaged to work through the Task Rabbit
9 platform.

10 3. The parties to the Task Rabbit case have reached a global settlement
11 covering this matter ("Maynard PAGA Case") as well as the Maynard Class Action Case
12 (Case No. RG21114858).

13 4. The settlement in this matter disposes of all of Plaintiff's remaining
14 individual claims, but does not purport to release any class or non-individual PAGA
15 claims. Any such claims are to be dismissed without prejudice.

16 5. The settlement agreement provides that its terms shall be kept confidential.
17 However, the parties have agreed that this Court can be informed that: the total amount
18 being paid by Defendant is \$120,000.00. The agreement provides that, after this Court
19 grants approval, Defendant will make payment and Plaintiff will subsequently seek
20 dismissal of this action with prejudice as to his individual claims and without prejudice as
21 to all other claims.

22 6. The executed settlement agreement is available for *in camera* review upon
23 request by the Court.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct. Executed this 17th day of May, 2024 at Sierra Madre,
26 California.

27 

28 ALLEN GRAVES

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss:
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18, and not a party to the within action. My business address is 122 N. Baldwin Avenue, Main Floor, Sierra Madre, California 91024.

On May 17, 2024, I served the following document(s) described as:

**DECLARATION OF ALLEN GRAVES IN SUPPORT OF
MOTION FOR APPROVAL OF INDIVIDUAL PAGA SETTLEMENT**

on the interested parties by transmitting a true and correct copy thereof addressed as follows:

MORRISON & FOERSTER LLP

Daralyn J. Durie
Andrew L. Perito
Ramsey W. Fisher
425 Market Street
San Francisco, CA 94105
ddurie@mofo.com;
aperito@mofo.com;
ramseyfisher@mofo.com

MORRISON & FOERSTER LLP

David McGowan
12531 High Bluff Drive, Suite 100
San Diego, CA 92130
dmcgowan@mofo.com

MORRISON & FOERSTER LLP

Whitney O'Byrne
707 Wilshire Boulevard, Suite 6000
Los Angeles, CA 90017
wobyne@mofo.com

**Attorneys for Defendants TaskRabbit, Inc., IKEA North America Services, LLC,
and Ikea US Retail LLC**

☒ **VIA EMAIL:** I personally sent such document(s) via email to the known email address of the person(s) on whom it is to be served.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and was executed on May 17, 2024, at Sierra Madre, California.

Adrian Hernandez

Type or Print Name

Signature