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12 Attorneys for Plaintiffs TAARIQ NASSAR, ISRAEL RIOS, and
13 the Putative Class

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

17 TAARIQ NASSAR, individually, and on
18 behalf of other members of the general public
similarly situated,

19 Plaintiff,

20 v.

21 DOLLY, INC., a Delaware corporation; and
22 DOES 1 through 10, inclusive,

23 Defendants.

24
25 AND ALL RELATED ACTIONS
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27

Case No. 25STCV24123
(Complaint Filed August 15, 2025)
Related and Lead Case No.: 25STCV19205
(Rios Filed July 1, 2025)
Assigned to: Hon. Theresa M. Traber

**PLAINTIFF TAARIQ NASSAR'S
DECLARATION IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: May 12, 2026
Time: 10:30 AM
Dept: 1

Trial Date: None Set

DECLARATION OF TAARIQ NASSAR

I, Taariq Nassar, state and declare as follows:

1. I am over the age of eighteen and the named Plaintiff and proposed Class Representative in this action. I make this declaration in support of the Motion for Preliminary Approval of Class and Representative Action Settlement and in support of my request for a Class Representative Enhancement Payment. I have personal knowledge of the facts set forth herein and could and would testify competently if called upon to do so.

2. I worked for Defendant Dolly, Inc. (“Dolly”) as an independent contractor in California. I used the Dolly app as a “Helper” starting on or about December 10, 2024. The last job I took as a Helper was approximately February 1, 2025. I am still active within the Dolly app. Based on my experience, I believed that I and other employees were not properly classified and compensated for overtime, denied uninterrupted meal and rest periods, were not properly compensated for missed or interrupted breaks, and were not provided with accurate wage statements, among other violations.

3. I chose to pursue this action and serve as a class representative because I believed our labor rights were being violated and that other employees were similarly affected but might be afraid or unable to come forward. I understood that doing so came with risks, including potential reputational harm and liability for costs if the case were unsuccessful, but I believed it was important to stand up for myself and others.

4. I remained in regular contact with my attorneys by phone and email throughout the case. I was involved in preparing for and debriefing after the October 21, 2025 mediation with Tripper Ortman. I made myself available during the mediation to assist and answer questions, and I reviewed and signed the Memorandum of Understanding and later the Settlement Agreement.

5. Since initiating the case, I have actively participated in the litigation. I retained experienced class action counsel, reviewed the Complaint, participated in discussions with my attorneys about my claims and the company’s policies, and provided information and documents relevant to the case.

1 6. I understand that, as a class representative, I assumed fiduciary responsibilities to
2 act in the best interests of the class. I believe I fulfilled those duties and was diligent in
3 representing the interests of the class and aggrieved employees.

4 7. I estimate that I have spent approximately 20-30 hours assisting with this case to
5 date, including time reviewing documents, assisting with the factual investigation, and staying
6 apprised of the case's developments.

7 8. As part of the settlement, I will be releasing all claims I may have against
8 Defendant, which is broader than the release applicable to other class members. In light of this
9 broader release, the time and effort I have invested in the case, the risks I undertook, and my role
10 in helping secure a settlement, I respectfully request a Class Representative Enhancement Payment
11 in the amount of \$10,000, subject to the Court's approval.

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13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct on 04/07/2026, at 0900, California.

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16 
17 Taariq Nassar (Apr 7, 2026 09:00:49 PDT)

18 Taariq Nassar
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