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Attorneys for Plaintiff Joseph Stevens,
on behalf of himself and all others similarly situated and aggrieved

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN BERNARDINO

JOSEPH STEVENS, on behalf of himself
and all others similarly situated and
aggrieved,

Plaintiff,

v.

GOSHARE INC., a Delaware Corporation;
and DOES 1 Through 10, inclusive,

Defendants.

Case No. CIVSB2428568

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Wilfred J. Schneider Jr.
Department S32

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF JOSEPH STEVENS IN
SUPPORT OF MOTION FOR ORDER
GRANTING PRELIMINARY APPROVAL
OF CLASS AND PAGA REPRESENTATIVE
ACTION SETTLEMENT**

Date: January 6, 2026

Time: 8:30 a.m.

Dept.: S32

Complaint filed: October 3, 2024

Trial Date: Not set

1 I, Joseph Stevens, declare as follows:

2 1. I am the Named Plaintiff in this case. This Declaration is based on my personal
3 knowledge and if called to testify I could competently testify to the matters in this Declaration.

4 2. I was employed by GoShare Inc. as a delivery driver between approximately
5 December 20, 2022 and August 31, 2023 in the California counties of San Bernardino and
6 Riverside.

7 3. As a driver for GoShare, I would accept delivery assignments through the GoShare
8 application, which I needed to download on my personal cell phone. After accepting a GoShare
9 assignment, I drove my personal car from my home in Riverside to a warehouse in San Bernardino
10 to retrieve my assigned small packages, which I would then deliver to GoShare customers
11 throughout Riverside and San Bernardino. I needed to use my personal cell phone to accept
12 assignments, get technical support from GoShare, and to clarify where packages were located
13 within the San Bernardino warehouse. GoShare classified me as an independent contractor,
14 paying me a flat rate for assignments, rather than by hours worked. GoShare did not reimburse
15 me for using my personal car and personal cell phone to make deliveries.

16 4. It usually took me approximately one hour to accept an assignment, pick up my
17 assigned package, and make a delivery for GoShare. I was usually paid about \$16-\$25 per
18 delivery.

19 5. A while after I stopped accepting assignments from GoShare, I decided to contact
20 attorneys because I believed that GoShare had misclassified me as an independent contractor and
21 had not paid me properly under California law. In June 2024, I retained the law firms of Cohelan
22 Khoury & Singer and Hamner Law Offices to pursue this case as a proposed wage and hour Class
23 action and as a PAGA Representative action.

24 6. By filing this lawsuit, I sought to help not only myself, but other drivers who were
25 not aware of their rights. I understood the lawsuit would require my attention for as long as it
26 proceeded, and I have devoted myself to assisting with this case since it was filed about a year
27 ago. I knew that this lawsuit would be public record, that future employers could find this lawsuit
28 online, and that, potentially, I might not be hired for new jobs because of this lawsuit. Despite

1 this risk, I decided to proceed, and I am happy my lawsuit will help other drivers.

2 7. I believe my thorough knowledge of GoShare's practices helped my attorneys
3 evaluate the claims and prepare for mediation. I made myself available by phone and email the
4 day of mediation to communicate with my lawyers.

5 8. After the case settled, I reviewed and asked questions about the terms of the
6 settlement and, after talking with my attorneys, signed the Settlement Agreement.

7 9. I understand I am eligible for a payment for serving as a class representative, and
8 the payment must be approved by the Court. Considering the risks I took, the work I did, not for
9 myself, but on behalf of other employees, the money those employees will receive, and the longer
10 time needed to obtain a class settlement, rather than individual settlement, I believe an award of
11 \$5,000 is reasonable.

12 10. It is hard to determine exactly how much time I spent on this case, but I estimate I
13 spent approximately five (5) to ten (10) hours finding my attorneys, providing them information
14 about my time working for GoShare, and listening to their explanations of the law and my case.
15 All time spent on the case was time I could not spend with family or friends or on other personal
16 activities. The knowledge that a lawsuit was pending with my name on it for all this time, and
17 that I could be called to a deposition or to answer discovery at any time, also weighed on my mind
18 during this time.

19 11. I am not related to any attorney working on this case, I am not aware of any
20 interests I have that go against the interests of the class, and I do not have any conflicts that would
21 keep me from adequately representing the class. I have been and remain committed to prosecuting
22 this case vigorously on behalf of the class.

23 12. I have not entered into any undisclosed agreements and I have not received any
24 undisclosed compensation in this case. The only compensation I will receive is what the Court
25 awards as a service payment and my share of the settlement as a class member/aggrieved
26 employee.

27 13. I have been advised in writing, and have signed, an Attorney/Client Representation
28 Agreement, informing me that any fees awarded in this case will be divided 66.66 % to Cohelan

1 Khoury & Singer and 33.34 % to Hamner Law Offices, and that the total fee charged by the
2 attorneys will in no way increase the total attorneys' fees I or other class member will pay in this
3 matter. I approve and consent to the proposed fee division.

4 I declare, under penalty of perjury under the laws of the United States of America and the
5 State of California that the foregoing is true and correct. Executed on 10/14/2025 | 12:25:53 PM PDT, at
6 Joseph Stevens, California.

DocuSigned by:

Joseph Stevens

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Joseph Stevens