

1 CHESA BOUDIN, SBN 284577
District Attorney of San Francisco
2 EVAN H. ACKIRON, SBN 164628
Assistant Chief District Attorney
3 SCOTT M. STILLMAN, SBN 267506
Assistant District Attorney
4 White Collar Crime Division
350 Rhode Island Street, Suite 400N
5 San Francisco, California 94103
Telephone: (628) 652-4394
6 Email: scott.stillman@sfgov.org

7 Attorneys for the People of the State of California

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **CITY AND COUNTY OF SAN FRANCISCO**
11 **UNLIMITED JURISDICTION**

12 THE PEOPLE OF THE STATE OF
CALIFORNIA,

13 Plaintiff,

14 vs.

15 DOORDASH, INC., and DOES 1 through 10,
16 inclusive,

17 Defendants.

CASE NO: CGC-20-584789

**THE PEOPLE OF THE STATE OF
CALIFORNIA'S NOTICE OF
MOTION AND MOTION FOR
PRELIMINARY INJUNCTION**

Hearing Date: October 5, 2020
Judge: Hon. Anne-Christine
Massullo
Time: 9:15 a.m.
Place: Dept. 304

Date Action Filed: JUNE 16, 2020

Trial Date: None Set

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21 **NOTICE OF MOTION AND MOTION**

22 To the Court, the parties, and counsel of record: Please take notice that, on October 5,
23 2020, at 9:15 a.m., or as soon thereafter as the parties may be heard, in Department 304 of the
24 Superior Court, County of San Francisco, 400 McAllister Street, San Francisco, California
25 94102, Plaintiff People of the State of California (the "People") will and hereby do move for a
26 preliminary injunction enjoining Defendant DoorDash, Inc., and Does 1-10 (collectively
27 "Defendant") from (1) classifying Defendant's delivery workers (whom Defendant calls
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1 “Dashers”) as independent contractors in violation of Labor Code section 2750.3, and (2)
2 violating any provisions of the Labor Code, the Unemployment Insurance Code, and the wage
3 orders of the Industrial Welfare Commission with regard to its Dashers. The People are
4 authorized to request such relief pursuant to Business and Professions Code section 17203.


5 The People seek a preliminary injunction enjoining Defendant from misclassifying
6 Dashers as independent contractors when California law clearly mandates that they be classified
7 as employees. This relief is warranted under the applicable legal standard as set forth in *IT Corp.*
8 *v. County of Imperial* (1983) 35 Cal.3d 63, and is necessary to prevent the serious ongoing harm
9 caused to the People by Defendant’s unlawful conduct.

10 This Motion is made pursuant to Code of Civil Procedure section 527 and is based on this
11 Notice of Motion and Motion; the accompanying Memorandum of Points and Authorities; the
12 Declarations of Scott M. Stillman, Shauwn Bland, Randi Stokes, Sompagnidi Zongo, Daryush
13 Khodadadi-Mobarakeh, Matt Post, and Jonathan Collum; the papers, records, and the pleadings
14 on file in this action, and any argument and evidence the Court may permit at the hearing.

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16 Dated: August 12, 2020

Respectfully Submitted,

CHESA BOUDIN
District Attorney, City and County of San Francisco
EVAN H. ACKIRON
Assistant Chief District Attorney
SCOTT M. STILLMAN
Assistant District Attorney

21 By: 
22 SCOTT M. STILLMAN
23 Assistant District Attorney