NICHOLAS & TOMASEVIC, LLP
Craig M. Nicholas (SBN 178444)
Alex Tomasevic (SBN 245598)
Shaun Markley (SBN 291785)
Jordan Belcastro (SBN 339570)
225 Broadway, 19th Floor
San Diego, California 92101
Tel: (619) 325-0492
Fax: (619) 325-0496
Email: cnicholas@nicholaslaw.org
Email: atomasevic@nicholaslaw.org
Email: smarkley@nicholaslaw.org
Email: jbelcastro@nicholaslaw.org

Attorneys for Plaintiffs,
TLALOC MUNOZ, MIGUEL RUIZ, EDGAR CORONA, and STEVEN SNAVELY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

TLALOC MUNOZ, an individual; MIGUEL RUIZ, an individual; EDGAR CORONA, an individual, STEVEN SNAVELY, an individual, on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

EARTHGRAINS DISTRIBUTION, LLC a Delaware limited liability company; BIMBO BAKERIES USA, INC., a Delaware corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. 3:22-cv-01269-AJB-AHG

DECLARATION OF MIGUEL RUIZ IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS AND PAGA REPRESENTATIVE ACTION SETTLEMENT AND MOTION FOR ATTORNEYS' FEES, COSTS, AND ENHANCEMENT AWARDS

Date: November 12, 2026
Time: 10:00 a.m.
Courtroom: 4A

Judge: Hon. Anthony J. Battaglia
Magistrate: Hon. Allison H. Goddard

SAC Filed: January 23, 2026
Trial Date: None Set

I, MIGUEL RUIZ, declare as follows:

1. I am a named Plaintiff and a court-appointed representative of the class in this action. I have personal knowledge of the facts below and could and would testify competently to them. I submit this declaration in support of Plaintiffs' Motion for Final Approval and Motion for Attorneys' Fees, Costs, and Enhancement Awards.

2. As discussed previously in this case, I received Earthgrains' Franchise Disclosure Document ("FDD") around July 2014 and signed a Distribution Agreement around September 2014. I operated as an Independent Business Partner ("IBP") out of the Sylmar sales center distributing Bimbo bakery products to my local territory of stores from 2014 until late 2019, and I bought additional route territory during that time. Defendants classified me as an independent contractor the entire time.

3. I worked alongside many other IBPs during my tenure, and I joined this case on behalf of all of us. From the start, I understood the case was a class action and that I would try to represent all California IBPs, not just myself, and that I had to put the class's interests ahead of my own. I have taken those duties seriously for more than four years, and I have invested significant time and energy in seeing this case through for myself and other IBPs.

4. No one promised me any payment or award for serving as a class representative. I understood this was a case involving risks and that it might not pan out or result in any money going to me or others.

5. I am not aware of any conflict of interest between me and any other current or former California IBP. As I understand it, my claims arise from the same independent contractor classification issue that applies to every California IBP under the Distribution Agreement. I have worked throughout this case to secure a recovery for what I believe to be worker misclassification of myself and others.

6. I have devoted much time, energy, and effort to this case. Early in the case, I spent time explaining to my lawyers how Bimbo operates, my role within its sales operation, and my history with the company. I gathered the documents my attorneys needed to evaluate and file the case. Pulling those records together meant searching through old files and devices given that I left the company many years ago. To get the case off the ground, I also reviewed the PAGA notice sent in May 2022 and the Complaint filed in July 2022. I estimate I spent approximately 4 hours on these tasks.

7. When Defendants moved to compel arbitration in October 2022, I discussed the motion and our opposition with my attorneys. I spent time searching for things like my FDD receipt and the FDD I was given, and I reviewed and signed my declaration in October 2022. I then stayed informed of the ruling on that motion and Defendants' appeal. I estimate I spent approximately 2 hours on these tasks.

8. After the appeal was over, I discussed the 2025 Early Neutral Evaluation with my attorneys, including my views on settlement, so they could prepare Plaintiffs' statement and represent me at the conference. I kept in touch with them during the conference, although I did not attend. I also touched base with them after it was over to understand next steps in the case. I estimate I spent approximately 2 to 3 hours on these tasks.

9. In May 2025, Earthgrains served me with 15 interrogatories and 54 requests for production. I worked with my attorneys to respond, and my initial responses were served in June 2025. Defendants pressed for more information and documents, and I provided three rounds of supplemental interrogatory responses in July and August 2025 and supplemental document responses in August 2025. Each round required more discussion with my attorneys, more searching for information and documents, and review before I signed verifications. By then I had been out of the business for about six years, so finding responsive records was hard and took real time. I had to track down and go through old phones and devices, dig through

old paper records, and search years-old texts and emails from my time as an IBP. Many of my records were in Bimbo's hands rather than mine, but I produced what I could find in about four productions between July and August 2025. I estimate I spent approximately 12 hours on these tasks.

10. I received and read deposition preparation materials from my attorneys, met with them to prepare, and followed up with questions before the deposition. That included a preparation meeting with my attorneys a few days before the deposition. I estimate I spent approximately 5 hours preparing for deposition.

11. Defendants deposed me in August 2025. I was on the record from about 9:00 a.m. until about 3:30 p.m. Before the deposition began, I conferred with my attorneys, and afterward I debriefed with them and asked questions. In total, the deposition took approximately 9 hours of my day.

12. I reviewed my transcript, which ran more than 180 pages, for accuracy and signed it. I estimate this took approximately 2 to 3 hours.

13. When Bimbo moved for summary judgment based on the release I signed when I sold my route, I worked with my attorneys on a declaration explaining the circumstances of that release. I also kept in touch with them to understand the outcome of the motion and next steps in the case. I estimate I spent approximately 2 hours on these tasks.

14. When my attorneys moved for class certification in late 2025, I discussed the evidence, my experience as an IBP, and my role as a class representative with them, and I stayed available to answer questions while the motion and reply were briefed. I estimate I spent approximately 2 to 3 hours on these tasks.

15. In the days before the mediation in November 2025 with Michael Russell, I discussed the case and settlement with my attorneys. On the day of the mediation, I was available and in communication with counsel. I estimate I spent

approximately 4 to 5 hours on the pre-mediation efforts and making myself available on the day of the mediation.

16. After the mediator made a proposal in December 2025, I spent additional time with my attorneys understanding its terms before it was accepted and approving the terms that we all agreed upon to settle the case. I estimate this took approximately 1.5 hours.

17. I reviewed and signed the Memorandum of Understanding in January 2026 and the Stipulation of Settlement in March 2026, and I discussed them with my attorneys. I estimate I spent approximately 2 hours reviewing, discussing, and signing these settlement documents.

18. Since then, I have kept up to date on the court approval process and my obligations under the Settlement. I estimate I have spent approximately 1 hour on this so far.

19. In addition to the efforts described above, for more than four years I stayed in regular contact with my attorneys by phone, text, and email to stay informed about the case and answer their questions. While it is hard to say exactly how much time that took given the length of the case, I estimate I spent approximately 4 to 8 hours on these ongoing communications that are not captured by any of the specific tasks described above.

20. In total, I estimate I have spent approximately 52 to 61 hours on this litigation over more than four years. I expect to spend more time through final approval and distribution, including staying in touch with my attorneys and seeing this case through to payment.

21. I also took on personal risk to see this case through. Running routes and performing direct-store delivery work as a franchisee or "independent contractor" is a small industry in this state. The distributors, warehouse workers, and sales managers know one another and often move from company to company (like Flowers Foods, Snyder's-Lance, Bimbo, and others). My name has been on public

filings suing one of the largest companies in this industry since 2022. While I have moved on to other types of work since leaving Bimbo, this is an industry I know well and have experience in. I believe it would be difficult to find work in this industry in the future given my public role as a named plaintiff accusing Bimbo of misclassifying its workers.

22. I had to sign a release to exit my relationship with Bimbo and move on to other work. I owed Bimbo money at the time, and to get that debt relieved and sell my route, I had to sign the release. Bimbo later asked the Court to throw out my claims based on that release, which I understood to be a major risk for other IBPs and me. If Bimbo had won, I would have recovered nothing after three years of work on the case. This was another major risk that I took, hoping to benefit myself and others in similar positions.

23. I produced personal records and answered questions under oath, on video, for most of a day about my finances, my business, and my family. This was uncomfortable but ultimately necessary.

24. I have carried this case for more than four years, through the arbitration fight, a two-year appeal, discovery, summary judgment, and class certification, with no guarantee of any recovery. I respectfully ask that the Court approve the requested service award given the result achieved in this case and the effort, stress, and time I put into it.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 4, 2026 in Arleta, California.

By: Miguel Ruiz (Oct 4, 2026 16:09:22 PDT)
Miguel Ruiz
Declarant & Plaintiff