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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 STEVEN SNAVELY 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, STEVEN SNAVELY, 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. I have worked in the bakery direct-store delivery business for more than 20 years. I have operated as an Independent Business Partner ("IBP") with Earthgrains (Bimbo) since 2013, distributing Bimbo bakery products to my local territory of stores. I signed Distribution Agreements with the company in 2013 and 2023, and I still operate as an IBP today. Defendants have classified me as an independent contractor the entire time.

3. I joined this case as a named plaintiff in May 2025. 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 since I joined, 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. As one of the IBPs still operating today, I understand where current IBPs stand under the Settlement, and it treats me the same way it treats every other current IBP.

6. I have devoted much time, energy, and effort to this case. When I joined in May 2025, the case was moving into its most active phase: written discovery, document productions, depositions, summary judgment, and class certification. Early on, I spent time explaining to my lawyers how Bimbo operates, my role within its sales operation, and my more than 20 years in the business. I gathered the documents my attorneys needed, and I reviewed the amended PAGA notice and the amended complaint that added me to the case. I estimate I spent approximately 4 hours on these tasks.

7. Shortly after joining the case, 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. Because I have run my business for years, I had a large volume of records to go through, including paper files, phones, texts, emails, and photos. I gathered and produced more than 1,500 pages of my business records, more than any other plaintiff, in about five productions between July and September 2025. I estimate I spent approximately 17 hours on these tasks.

8. I received and read deposition preparation materials from my attorneys, met with them to prepare, and followed up with questions before the deposition. I was the first plaintiff Defendants deposed. I estimate I spent approximately 6 hours preparing for deposition.

9. Defendants deposed me in August 2025. I was on the record from about 8:00 a.m. until about 1:45 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 8.5 hours of my day, time I had to take away from running my route.

10. I reviewed my transcript, which ran more than 250 pages, for accuracy and signed it with an errata. I estimate this took approximately 2 to 3 hours.

11. 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 also worked with my attorneys on a declaration in support of Plaintiffs' reply in December 2025. I estimate I spent approximately 3 to 4 hours on these tasks.

12. 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.

13. After the mediator made a proposal in December 2025, I spent additional time with my attorneys understanding its terms, including how the settlement would apply to current IBPs like me, before it was accepted and approving the terms that we all agreed upon to settle the case. I estimate this took approximately 2 hours.

14. 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.

15. 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.

16. In addition to the efforts described above, since I joined the case 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 3 to 6 hours on these ongoing communications that are not captured by any of the specific tasks described above.

17. In total, I estimate I have spent approximately 52 to 59 hours on this litigation over the roughly year and a half since I joined. 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.

18. I also took on a personal risk as a current IBP. I stepped up to sue the company that I still depend on every day to earn money and support my family. Bimbo supplies all of the product I sell, controls my territory, can issue breach notices and terminate my Distribution Agreement, and has a say in whether and how I can sell my distribution rights. By putting my name on this lawsuit, I risked retaliation in my day-to-day business, strained relationships with the managers I deal with, and the loss of future opportunities to buy or grow routes with Bimbo. I wanted to do so anyways because I thought the perspective of a current IBP to the case was important and that I could help advance the interests being pursued in a unique way as someone with a long and ongoing history with Bimbo.

19. 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. The people that work within the industry – distributors, warehouse workers, and sales managers – know one another and often move from company to company. I have spent more than 20 years in this industry, and it is my livelihood. Putting my name on a public lawsuit challenging how this industry operates could make it harder for me to find future opportunities in this industry, whether with Bimbo or another company.

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

21. Although I joined this case after the other plaintiffs, I joined when it moved into discovery, depositions, summary judgment, and class certification, and I did the same kind of work the other plaintiffs did during that phase. I also took on the added risk of suing my current source of income and challenging the industry in which I've worked for the last two decades. I respectfully ask that the Court approve the requested service award, given the result achieved in this case and the effort, stress, and risk I took on.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 9-28-26, 2026 in Winchester, California.

By: Steven Snavely (Sep 28, 2026 18:42:40 PDT)
Steven Snavely
Declarant & Plaintiff