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Attorneys for Plaintiff and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SHASTA

RYAN MIDDLEBROOKS, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

FLEETPRIDE, INC., an Alabama
corporation; and DOES 1 through 50,
inclusive,

Defendants

Case No. 23CV-0202247

(Assigned to the Hon. Stephen H. Baker, Dept. 3)

**DECLARATION OF RYAN MIDDLEBROOKS
IN SUPPORT OF PLAINTIFF’S MOTION
FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: September 9, 2024

Time: 8:30 A.M.

Dept.: 3

Action Filed: May 16, 2023

Trial Date: November 5, 2024

DECLARATION OF RYAN MIDDLEBROOKS

I, Ryan Middlebrooks, declare as follows:

1. I am an individual over the age of 18 years old and am a resident of California. I am the named Plaintiff in this matter. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I began working for Defendant FleetPride, Inc. ("Defendant") in or about October 2022 as a Local Delivery Driver in Redding, California. Throughout my employment, I worked as an hourly, non-exempt employee. My employment ended on or about April 26, 2023.

3. During my employment with Defendants, I regularly received overtime wages. Whenever these wages were paid to me, however, the accompanying wage statements I received did not identify the correct total hours worked for the pay period.

4. I understand that this action was brought on behalf of all other employees in the State of California, and that I am acting as a representative for the Settlement Class. As the Class Representative, I understand that it is my responsibility to act in the best interests of the Settlement Class and not my own. I agree that I will not put my own interests ahead of those of the Settlement Class, and that I will not settle out my class claims in this lawsuit separately or independently from the Settlement Class. Moreover, I am not aware of any conflicts that exist between my interests and the interests of the Settlement Class that would impair or affect my ability to serve as representative for the Settlement Class.

5. I have and continue to be willing to assist in the investigation of this matter, including meeting, conferring, and discussing the case with my attorneys, providing any necessary information and documents, and making myself available for trial or any further proceedings in this matter as required to represent the interests of the Settlement Class. I also understand my duties and responsibilities to the proposed class and will carry out those duties as necessary.

6. I have discussed the case with my attorneys on a number of occasions, provided information and documents to my attorneys to help with the prosecution of the case, and reviewed documents in the case, including the Joint Stipulation Re: Class Action and

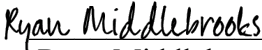
Representative Action Settlement (“Settlement Agreement”).

7. I have discussed the terms of the Settlement Agreement with my attorneys, and based on the information provided, I believe the settlement to be fair, adequate, and reasonable for myself and for the entire Settlement Class.

8. I also executed a general waiver of any and all claims, including a waiver of California Civil Code § 1542, which I understand was not required of other Settlement Class Members.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 5th day of August 2024, at Redding, California.

DocuSigned by:

87E5685170649E
Ryan Middlebrooks