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**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 FINAL APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: March 24, 2025

Time: 8:45 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. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including meeting with them and providing them with documents and information. I have continuously been kept apprised of the status of this case. Specifically, I have discussed the allegations in the lawsuit, relevant documents, and policies with my attorneys. I have also reviewed and approved the settlement documents and other pleadings in this case.

5. I estimate I have spent between 40-50 hours assisting my attorneys litigate this case. I reviewed documents that I had that were related to my employment. I also reviewed documents related to the lawsuit and the filing with the Labor and Workforce Development Agency. I discussed these with my lawyers. I answered questions posed by my lawyers regarding the underlying facts of the case including how my employer paid me overtime and how this information was displayed on my wage statements. I understand that these actions were important to achieving the result achieved in this case. I also reviewed the Settlement Agreement and supporting documents.

6. 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.

7. 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.

8. Based on my understanding of the case, I am of the opinion that settlement for the consideration and on the terms set forth in the Joint Stipulation Re: Class Action and Representative Action Settlement (“Settlement Agreement”) are fair, reasonable, and adequate and is in the best interests of the Settlement Class.

9. I understand that I could have been liable for Defendant’s legal costs had Defendant prevailed. I also understand that this lawsuit was filed in the public court records. I was concerned that I might be negatively impacted by the filing of this case but decided it was worth it to achieve this result for myself and for all the other employees that were impacted by the company’s labor practices at issue in this case.

10. 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. This was a more expansive release than the other individuals who are participating in the settlement will provide.

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

Executed on this 26th day of February 2025, at Redding, California.

Signed by: 
B77804903 Ramona Middlebrooks