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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. 64)

**DECLARATION OF LLUVIA ISLAS OF
PHOENIX SETTLEMENT
ADMINISTRATORS IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: September 9, 2024

Time: 8:30 A.M.

Dept.: 64

Action Filed: May 16, 2023

Trial Date: November 5, 2024

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1. I am a Case Manager at Phoenix Settlement Administrators (“Phoenix”), the Court-appointed Class Action Settlement Administrator for *Middlebrooks v Fleetpride* (the “Action”). I have personal knowledge of the facts stated herein and, if called upon to testify, I could and would testify competently to such facts.

3. On October 18, 2024, Phoenix received a data file from Defense Counsel that contained names, last known mailing addresses, telephone numbers, Social Security numbers, and wage statements received for each Class Member (“Class List”) during the Class and PAGA Period. The final mailing list contained two hundred eighty (280) individuals identified as Class Members.

1 4. On October 18, 2024, Phoenix conducted a National Change of Address
2 (“NCOA”) search in an attempt to update the class list of addresses as accurately as possible.
3 A search of this database provides updated addresses for any individual who has moved in the
4 previous four (4) years and notified the U.S. Postal Service of their change of address.

5 5. On October 25, 2024, Phoenix mailed the Notice via U.S. first class mail to all
6 two hundred eighty (280) Class Members on the Class List. A true and correct copy of the
7 mailed Notice is attached hereto as **Exhibit A**.

8 6. As of the date of this declaration, zero (0) Notices have been returned to Phoenix.
9 None were returned with a forwarding address.

10 7. As of the date of this declaration, Phoenix has received zero (0) Request for
11 Exclusion from Class Members. The deadline to request exclusion from the Class Settlement
12 was December 24, 2024.

13 8. As of the date of this declaration, Phoenix has received zero (0) Notices of
14 Objection from Class Members. The deadline for objecting to the Class Settlement was
15 December 24, 2024.

16 9. As of the date of this declaration, Phoenix has received zero (0) Workweek
17 disputes from Class Members. The deadline for submitting a dispute was December 24, 2024.

18 10. The Net Settlement Amount of \$148,181.78 available to pay Settlement Class
19 Members was determined by subtracting the requested Class Counsel attorneys' fees
20 (\$110,250.00), and Class Counsel costs (\$8,068.22), requested Enhancement Payment to
21 Plaintiff Middlebrooks (\$10,000.00), and the requested Settlement Administration Costs
22 (\$8,500.00) from the Gross Settlement Amount (\$315,000.00).

23 11. There are two hundred eighty (280) Class Members who did not submit timely
24 and valid Requests for Exclusion and are therefore deemed Settlement Class Members,
25 representing 100% of the Class. Settlement Class Members have received a collective total of
26 eleven thousand two hundred eleven (11,211) Qualifying Wage Statements during the Class
27 Period. The highest Individual Settlement Share to be paid is approximately \$1,070.62, the
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1 lowest Individual Settlement Share to be paid is approximately \$13.22 and the average
2 Individual Settlement Share to be paid is approximately \$529.22. Pursuant to the Settlement,
3 these payments are characterized as civil or statutory penalties and interest, to be reported on
4 an IRS Form 1099.

5 12. Additionally, \$30,000.00 of the Gross Settlement Amount has been allocated
6 toward penalties under the Private Attorneys General Act (“PAGA Amount”), of which 75%,
7 or \$22,500.00, shall be paid to the Labor and Workforce Development Agency (“LWDA”),
8 and 25%, or \$7,500.00, shall be paid to Aggrieved Employees who are or were employed by
9 Defendant during the PAGA Period. There are two hundred eighty (280) Aggrieved
10 Employees who received a total of eleven thousand two hundred eleven (11,211) Qualifying
11 Wage Statements during the PAGA Period. The highest Individual PAGA Payment to be paid
12 is approximately \$54.19, the lowest Individual PAGA Payment to be paid is \$0.67 and the
13 average Individual PAGA Payment to be paid is approximately \$26.79.

14 13. Plaintiff Middlebrooks is estimated to receive an Individual Settlement Share
15 of \$449.40 and an Individual PAGA Payment of \$22.75.

16 14. Phoenix’s costs associated with the administration of this matter are \$8,500.00.
17 This includes all costs incurred to date, as well as estimated costs involved in completing the
18 settlement distribution. A true and correct copy of the invoice from Phoenix is attached hereto
19 as **Exhibit B**.

20 15. Checks distributed pursuant to the Settlement will remain negotiable for 180 days
21 and will be sent to the California State Controller’s Office Unclaimed Property Fund in the
22 name of the individual if they are not cashed.
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1 I declare under penalty of perjury of the laws of the State of California that the foregoing
2 is true and correct.

3 Executed this 27th day of February 2025, at Orange, California.
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5 *Lluvia Islas*

6 _____
7 LLUVIA ISLAS
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Exhibit A

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT AND DATE
FOR FINAL APPROVAL HEARING
Middlebrooks v. FleetPride, Inc.
(County of Shasta, California Superior Court Case No. 202247)**

**As a current or former non-exempt, hourly-paid California employee of FleetPride, Inc.
who earned overtime or doubletime, you are entitled to receive money from a class action settlement.**

Please read this Notice carefully. This Notice relates to a proposed settlement of class and representative action lawsuit. If you are a Class Member or an Aggrieved Employee, it contains important information about your right to receive a payment from the Settlement.

You have received this Notice of Class Action Settlement because the records of FleetPride, Inc. (“FleetPride” or “Defendant”) show you are a “Class Member” and/or an “Aggrieved Employee,” and therefore are entitled to a payment from this class and representative action Settlement. Class Members are all persons who were employed by FleetPride in California in an hourly, non-exempt position and were paid overtime and/or doubletime wages at any time between May 8, 2022 and September 15, 2023 (“Class Period” or “Settlement Period”). Aggrieved Employees are all persons who were employed by FleetPride in California in an hourly, non-exempt position and were paid overtime and/or doubletime wages at any time during the PAGA Period, which is defined as May 8, 2022 through September 15, 2023.

- The Settlement is to resolve a class and representative action lawsuit, *Middlebrooks v. FleetPride, Inc., et al.*, pending in the Superior Court of California for the County of Shasta, Case Number 202247 (the “Lawsuit”), alleging, among other things, that, during the Class Period, FleetPride, as it pertains to Class Members, failed to provide complete and accurate wage statements in violation of Labor Code § 226. Based on the same alleged violations of Labor Code § 226, Plaintiff also seeks civil penalties under the California Labor Code Private Attorney Generals Act (“PAGA”) for the State of California and allegedly Aggrieved Employees.
- On September 18, 2024, the Shasta County Superior Court granted preliminary approval of this class action settlement and ordered that all Class Members be notified of the Settlement. The Court has not made any determination of the validity of the claims in the Lawsuit. Defendant vigorously denies the claims in the Lawsuit and contends that it fully complied with all applicable laws.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
DO NOTHING AND RECEIVE PAYMENT	Get a payment and give up your legal rights to pursue claims released by the Settlement of the Lawsuit.
OPT OUT OF THE CLASS SETTLEMENT	Exclude yourself from the class action portion of the Settlement, get no payment for settlement of the class claims, and retain your legal rights to individually pursue the class claims that would otherwise be released by the Settlement of the Lawsuit. If you worked in the PAGA Period as an hourly-paid non-exempt employee of FleetPride and were paid overtime and/or doubletime wages, then you will be deemed a “Aggrieved Employee” and you will still receive your share of the proceeds available from the settlement of the PAGA Released Claims, defined below, (your “Individual PAGA Payment”) even if you opt out of the class settlement.
OBJECT TO THE CLASS SETTLEMENT	If you do not opt out, you may write to the Settlement Administrator, Phoenix Settlement Administrators, about why you object to the Settlement, and they will forward your concerns to counsel which will then be provided to the Court. If the Court approves the Settlement despite your objection, you will still be bound by the Settlement. You or your attorney may also address the Court during the Final Approval Hearing scheduled for March 24, 2025, at 8:30 a.m. , in Department 64 of the Shasta County Superior Court located at 1515 Court Street, Redding, CA 96001.

The Final Approval Hearing on the adequacy, reasonableness, and fairness of the Settlement will be held on **March 24, 2025, at 8:30 a.m.**, in the Shasta County Superior Court located at 1515 Court Street, Redding, CA 96001, in Department 64. You are not required to attend the Hearing, but you are welcome to do so.

Why Am I Receiving This Notice?

FleetPride’s records show that you performed work for FleetPride in the State of California as a non-exempt, hourly-paid employee and were paid overtime and/or doubletime wages at some point during the Class Period and/or PAGA Period. You were sent this Class Notice because you have a right to know about a proposed settlement of a class action lawsuit, and about all of your options before the Court decides whether to finally approve the Settlement. If the Court approves the Settlement and then any objections and appeals are resolved, a “Settlement Administrator” appointed by the Court will make the payments described in this Notice. This Notice explains the Lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

What Is This Case About?

Plaintiff Ryan Middlebrooks was a non-exempt, hourly-paid employee of FleetPride. He is the “Plaintiff” in this case and is suing on behalf of himself and Class Members for Defendant’s alleged failure to issue complete and accurate wage statements. Based on the same alleged wage statement violations, Plaintiff also seeks to recover civil penalties under PAGA.

Questions? Contact the Settlement Administrator toll free at (800) 523-5773

Defendant denies all of the allegations made by Plaintiff and denies that it violated any law. The Court has made no ruling on the merits of Plaintiff's claims. The Court has only preliminarily approved this class action settlement. The Court will decide whether to give final approval to this settlement at the Final Approval Hearing.

Summary of the Settlement Terms

Plaintiff and Defendant have agreed to settle this case on behalf of themselves and Class Members and Aggrieved Employees for the Gross Settlement Amount of \$315,000.00. The Gross Settlement includes: (1) Administration Costs up to \$8,500.00 (2) up to 35% of the Gross Settlement Amount in attorneys' fees, which amounts to \$110,250.00; (3) up to \$15,000.00 in litigation costs to Class Counsel, according to proof; (4) up to \$10,000.00 in a Service Award to the Class Representative; and (5) payment allocated to PAGA penalties in the amount of \$30,000.00 of which 75% (or \$22,500.00) will be paid to the California Labor and Workforce Development Agency ("LWDA"), and twenty-five percent 25% (or \$7,500.00) will be distributed to Aggrieved Employees. After deducting these sums, a total of approximately not less than \$141,250.00 will be available for distribution to Class Members ("Net Settlement Amount").

Distribution to Class Members

Class Members who do not opt out will receive a *pro rata* payment of the Net Settlement Amount based on the number of wage statements that reflect payment of overtime and/or doubletime wages issued to Class Members in non-exempt, hourly-paid positions for FleetPride in California during the Class Period ("Qualifying Wage Statements"). Specifically, Class Members' payments will be calculated by dividing the number of Qualifying Wage Statements attributed to the Class Member by all Qualifying Wage Statements attributed to members of the Settlement Class, multiplied by the Net Settlement Amount. Otherwise stated, the formula for a Class Member is: (Individual's Qualifying Wage Statements ÷ total Settlement Class Qualifying Wage Statements) x Net Settlement Amount. In addition, Class Members who worked during the PAGA Period (i.e., Aggrieved Employees) will receive a *pro rata* share of the \$7,500.00 allocated as PAGA penalties to Aggrieved Employees, whether or not they opt out of the class settlement, based on the number of Qualifying Wage Statements issued to each Aggrieved Employee during the PAGA Period.

FleetPride's records indicate that you were issued «Paga_Wage_Statements» as a non-exempt, hourly-paid employee in California during the Class Period and «Paga_Wage_Statements» during the PAGA Period. Based on these records, your estimated payment as a Class Member would be «ESA_Before_Paga» and your estimated payment as an Aggrieved Employee would be «PAGA_Amount». If you believe this information is incorrect and wish to dispute it, you must mail a dispute to the Settlement Administrator and it must be postmarked no later than **December 24, 2024**. Please include: (1) your name, address, telephone number, and your signature; (2) a statement of your dispute and how many Qualifying Wage Statements you contend should be credited to you; and (3) any documentation you have that you contend supports your dispute.

Tax Reporting

100% of each Settlement Payment to Class Members who do not opt out will be allocated as civil or statutory penalties and interest, which will be reported on an IRS Form 1099. 100% of the payments for PAGA penalties to Aggrieved Employees will be allocated as penalties reported on an IRS Form 1099. This notice is not intended to provide legal or tax advice on your Settlement Share.

Your check will be valid for 180 days after issuance. After 180 days, uncashed checks shall be sent to the California State Controller's Office Unclaimed Property Fund in the name of the individual, and such Class Members and/or Aggrieved Employees shall nevertheless be bound to the Settlement and the Final Approval Order.

Your Options Under the Settlement

Option 1 – Do Nothing and Receive Your Payment

If you do not opt out, you are automatically entitled to your Individual Settlement Payment (i.e., your share of the Net Settlement Amount) because you are a Class Member. If you do not dispute your settlement share calculation and do not opt out of the Settlement, you will be bound by the entire release in the Settlement and receive your Individual Settlement Payment, as well as your Individual PAGA Payment if you are also an Aggrieved Employee. **In other words, if you are a Class Member, you do not need to take any action to receive the settlement payment(s) set forth above.**

Class Members who do not submit a valid and timely opt out (pursuant to Option 2 below), will be deemed to have fully, finally, and forever released, settled, compromised, relinquished, and discharged the Released Parties of all Released Claims he or she may have or had upon final approval of this Settlement and payment by Defendant to the Settlement Administrator.

Effective only upon the entry of an Order granting Final Approval of the Settlement, entry of Judgment and payment by Defendant to the Settlement Administrator of the full Gross Settlement Amount, Plaintiff and all Participating Class Members release the Released Parties of any and all claims that have been or could reasonably have been asserted based on the factual allegations in the Operative First Amended Complaint for alleged failure to furnish complete and accurate wage statements in violation of Labor Code § 226, and all other claims for relief, including damages, statutory and/or civil penalties, equitable and/or injunctive relief, attorneys' fees, interest, costs, and any other kind of relief whatsoever that could be sought based on the factual allegations and theories of liability asserted in the Operative First Amended Complaint (the "Class Released Claims").

For Plaintiff, the Aggrieved Employees, and, to the extent permitted by law, the State of California, the release includes, for the duration of the PAGA Period, all claims alleged in the PAGA Notice and the Operative First Amended Complaint for PAGA civil penalties pursuant to Labor Code sections 226, 226.3 and 2698, et seq. in connection with alleged violations of Labor Code section 226 for alleged failure to furnish complete and accurate wage statements (the "PAGA Released Claims"). The Class Released Claims and PAGA Released Claims are collectively referred to herein as the "Released Claims."

“Released Parties” means Defendant and each of its past, present, and future respective subsidiaries, dba’s, affiliates, parents, insurers and reinsurers, and company-sponsored employee benefit plans of any nature and their successors and predecessors in interest, including all of their officers, directors, shareholders, employees, agents, principals, heirs, representatives, accountants, auditors, consultants, attorneys, administrators, fiduciaries, trustees, and agents.

Option 2 – Opt Out of the Settlement

If you do **not** wish to receive your Individual Settlement Payment or release the Class Released Claims, you may exclude yourself by submitting a written request to be excluded from the Class. Your written request must expressly and clearly indicate that you do not want to participate in the Settlement, and you desire to be excluded from the Settlement. The written request for exclusion must include your name, and the following statement or any statement standing for the proposition that you seek to be excluded from the Settlement Class: “Please exclude me from the Settlement Class in the *Middlebrooks v. FleetPride, Inc., et al.* matter. I understand that by requesting exclusion, I will not participate in the class settlement and will not receive any money from the class settlement.” or any statement of similar meaning standing for the proposition that you do not wish to participate in the Settlement. Sign, date, and mail your written request for exclusion by U.S. First-Class Mail to the address below.

Phoenix Settlement Administrators
P.O. Box 7208
Orange, CA 92863

Your written request for exclusion must be mailed to the Administrator and postmarked not later than **December 24, 2024**.

The proposed Settlement includes the settlement of the PAGA Released Claims. An employee may not request exclusion from the settlement of a PAGA claim. Thus, if the court approves the Settlement, then even if you request exclusion from the Class Settlement, if you are an Aggrieved Employee, you will still receive your Individual PAGA Payment and will be deemed to have released the PAGA Released Claims. A request for exclusion will preserve your right, if any, to individually pursue only the Class Released Claims.

Option 3 – Submit an Objection to the Settlement

If you wish to object to the Settlement, you may submit an objection in writing stating why you object to the Settlement. Your written objection must provide your name, address, signature, and a statement of the reason(s) why you believe that the Court should not approve the Settlement. Your written objection must be mailed the Administrator and postmarked no later than **December 24, 2024**. Please note that you cannot both object to the Settlement and opt out of the Settlement. If you exclude yourself, then your objection will be overruled. If the Court overrules your objection, you will be bound by the Settlement and will receive your Settlement Share.

Final Approval Hearing

You may, if you wish, also appear at the Final Approval Hearing set for **March 24, 2025, at 8:30 a.m.**, in the Shasta County Superior Court located at 1515 Court Street, Redding, CA 96001, in Department 64, and orally object to the Settlement, discuss your written objections with the Court and the Parties, or otherwise comment on the Settlement at your own expense. You may also retain an attorney to represent you at the Hearing at your own expense.

Additional Information

This Notice of Class Action Settlement is only a summary of this case and the Settlement. For a more detailed statement of the matters involved in this case and the Settlement, or if you have questions, you may call the Settlement Administrator at (800) 523-5773. The information for Class Counsel appears below. If you choose to participate in the Settlement, you will be represented by Class Counsel.

CLASS COUNSEL

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You may also visit the Settlement Administrator’s website at middlebrooks-v-fleetpride.phoenixcases.com to gain access to key documents in this case, including the Settlement Agreement, the Order Granting Preliminary Approval of this Settlement, the Order Granting Final Approval of this Settlement, and the Final Judgment.

You may also refer to the pleadings, the Settlement Agreement, and other papers filed in this case, which may be inspected at the Shasta County Superior Court located at 1515 Court Street, Redding, CA 96001, during regular business hours of each court day.

All inquiries by Class Members regarding this Notice of Class Action Settlement and/or the Settlement should be directed to the Settlement Administrator.

Counsel for Defendant

In this case, Defendant is represented by the attorneys below. However, if you choose to participate in the Settlement, you should direct any questions regarding it to the Settlement Administrator and/or Class Counsel because Class Counsel will be your attorneys.

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PLEASE DO NOT CONTACT THE CLERK OF THE COURT OR THE JUDGE WITH INQUIRIES.

Exhibit B



PHOENIX

CLASS ACTION ADMINISTRATION SOLUTIONS

CASE ASSUMPTIONS

Class Members	280
Opt Out Rate	0%
Opt Outs Received	0
Total Class Claimants	280
Subtotal Admin Only	\$8,506.13

Not-to-Exceed Total **\$8,500.00**

February 27, 2025

Case: Middlebrooks v Fleetpride Invoice

Case & Database Setup / Toll Free Setup & Call Center / NCOA (USPS)

Administrative Tasks:	Rate	Hours/Units	Line Item Estimate
Programming Manager	\$100.00	2	\$200.00
Programming Database & Setup	\$100.00	2	\$200.00
Toll Free Setup*	\$150.69	1	\$150.69
Call Center & Long Distance	\$2.00	16	\$32.00
NCOA (USPS)	\$135.00	2	\$270.00
Total			\$852.69

* Up to 120 days after disbursement

Data Merger & Scrub / Notice Packet, Opt-Out Form & Postage / Spanish Translation / Reporting

Project Action	Rate	Hours/Units	Line Item Estimate
Notice Packet Formatting	\$105.00	3	\$315.00
Data Merge & Duplication Scrub	\$0.25	280	\$70.00
Notice Packet & Opt-Out Form	\$1.25	280	\$350.00
Estimated Postage (up to 2 oz.)*	\$0.84	280	\$235.20
Static Website	\$250.00	1	\$250.00
Total			\$1,220.20

* Prices good for 90 days. Subject to change with the USPS Rate or change in Notice pages or Translation, if any.



PHOENIX

CLASS ACTION ADMINISTRATION SOLUTIONS

Skip Tracing & Remailing Notice Packets / Tracking & Programming Undeliverables

Project Action:	Rate	Hours/Units	Line Item Estimate
Case Associate	\$55.00	3	\$165.00
Skip Tracing Undeliverables	\$1.75	56	\$98.00
Remail Notice Packets	\$1.25	56	\$70.00
Estimated Postage	\$0.84	56	\$47.04
Programming Undeliverables	\$50.00	2	\$100.00
Total			\$480.04

Database Programming / Processing Opt-Outs, Deficiencies or Disputes

Project Action:	Rate	Hours/Units	Line Item Estimate
Programming Claims Database	\$135.00	2	\$270.00
Non Opt-Out Processing	\$200.00	1	\$200.00
Case Associate	\$55.00	4	\$220.00
Opt-Outs/Deficiency/Dispute Letters	\$10.00	3	\$30.00
Case Manager	\$85.00	2	\$170.00
Total			\$890.00

Calculation & Disbursement Programming/ Create & Manage QSF/ Mail Checks

Project Action:	Rate	Hours/Units	Line Item Estimate
Programming Calculations	\$135.00	3	\$405.00
Disbursement Review	\$135.00	3	\$405.00
Programming Manager	\$95.00	3	\$285.00
QSF Bank Account & EIN	\$125.00	2	\$250.00
Check Run Setup & Printing	\$125.00	4	\$500.00
Mail Class Checks *	\$1.25	280	\$350.00
Estimated Postage	\$0.64	280	\$179.20
Total			\$2,374.20

* Checks are printed on 8.5 x 11 in. sheets with W2/1099 Tax Filing



PHOENIX

CLASS ACTION ADMINISTRATION SOLUTIONS

Tax Reporting & Reconciliation / Re-Issuance of Checks / Conclusion Reports and Declarations			
Project Action:	Rate	Hours/Units	Line Item Estimate
Case Supervisor	\$100.00	4	\$400.00
Remail Undeliverable Checks (Postage Included)	\$1.50	56	\$84.00
Case Associate	\$55.00	2	\$110.00
Reconcile Uncashed Checks	\$75.00	3	\$225.00
Conclusion Reports	\$125.00	2	\$250.00
Case Manager Conclusion	\$85.00	2	\$170.00
Final Reporting & Declarations	\$125.00	2	\$250.00
IRS & QSF Annual Tax Reporting * (1 State Tax Reporting Included)	\$1,200.00	1	\$1,200.00
Total			\$2,689.00

* All applicable California State & Federal taxes, which include SUI, ETT, and SDI, and FUTA filings. Additional taxes are Defendant's responsibility.

Total: \$8,506.13