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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE, CIVIL COMPLEX CENTER

EUDIER LEAÑO on behalf of himself and all others similarly situated,

PLAINTIFF,

v.

RYDER LAST MILE, INC., a. Florida Company, and DOES 1-10, inclusive,

DEFENDANTS.

RYDER LAST MILE, INC., a California Corporation,

CROSS-COMPLAINANT,

v.

SLG, LLC., a. Limited Liability Company, and DOES 1-250, inclusive,

CROSS-DEFENDANTS.

Case No.:30-2024-01405201-CU-OE-CXC

[Assigned for all purposes to the Honorable Melissa R. McCormick, Dept. CX105]

DECLARATION OF EUDIER LEAÑO ISO PLAINTIFF'S UNOPPOSED MOTION FOR APPROVAL OF PAGA SETTLEMENT

[Filed concurrently with Unopposed Motion to Approve PAGA Settlement; and [Proposed] Orders]

Reservation No.:	**74989415**
Date:	March 4, 2027
Time:	2:00 p.m.
Place:	CX105

Complaint Filed:	June 6, 2024
FAC Filed:	December 9, 2024
Trial Date:	None
Cross-Complaint Filed:	August 4, 2025

I, EUDIER LEAÑO, declare as follows:

1. I make this declaration of my own personal knowledge, and if called to testify, I could and would testify competently to the matters stated herein.

2. I have personal knowledge of the facts set forth in this declaration and would testify competently thereto.

3. This declaration is submitted in support of Plaintiffs' Unopposed Motion for Approval of Private Attorney General Act ("PAGA") Settlement.

4. I have served as the lead Plaintiff in this matter since I retained Plaintiff's Counsel in approximately May 2024.

5. I worked as a Carrier Owner driver for Ryder Last Mile from October 2021 – approximately September 2024.

6. Since I joined the lawsuit in 2024, approximately 2.5 years ago, I have poured in significant time and energy participating as the named Plaintiff in this action. I estimate that I spent approximately 300 hours performing services in support of the lawsuit, including the following tasks:

a. Being interviewed in detail by my attorneys and providing information about my job duties and Ryder's policies and practices, as part of the initial investigation;

b. Searching for and sending documents to provide more information about my experience at Ryder to my attorneys;

c. Reviewing a proposed representation agreement and carefully considering whether to serve as a Named Plaintiff, understanding that my name would be on publicly filed court documents and could affect my current or future employment prospects;

d. Reviewing a draft of the Complaint prior to authorizing my attorneys to file this lawsuit, and seeking advice from my attorneys about it;

e. Submitting initial discovery disclosures;

f. Responding to interrogatories and requests for production of documents, and searching for and providing responsive documents;

g. Assisting my attorneys with drafting appropriate interrogatories and requests for production of documents, based on my job duties, employment and knowledge of Ryder's practices;

h. Participating in multiple interviews with my attorneys about my experience at Ryder in preparing for mediation;

i. Coordinating payment to and communications with the Franchise Tax Board to respond to Ryder's statement to Court regarding my business, SLG, LLC;

j. Discussing mediation strategy and settlement numbers with my attorneys before, during and after the mediation;

k. Attending a full day of mediation and responding to questions from the mediator;

l. Discussing with my attorneys and approving the mediator's proposal; and

m. Reviewing the Memorandum of Understanding, discussing it in detail with my attorneys, and signing it.

7. I was also prepared and stood ready to perform additional tasks that I understood are required of a Named Plaintiff, including producing discovery documents, reaching out to other potential aggrieved employees, providing additional information to my attorney via phone and Zoom meetings, preparing for a deposition, and testifying at trial if necessary.

8. Deciding to serve as a Named Plaintiff was not easy for me. Soon after I filed this lawsuit, Ryder subjected me to an audit, and then, my contract with Ryder was terminated. This made me feel afraid and stressed because I believed I was being retaliated against for filing this lawsuit. I lost a good amount of my income and was also afraid that this may impact my ability to drive for other companies. I feared that other trucking companies might retaliate or hesitate to hire me if they learned I had been involved in this lawsuit. These worries have weighed heavily on me, and they continue to affect how I think about my future as a driver. Nevertheless, I

continued with this lawsuit because I believe in the importance of accountability and fairness.

9. I faced additional stress and anxiety when Ryder informed the Court that my company, SLG, LLC was suspended by the Franchise Tax Board due to overdue taxes. I was deeply concerned that Ryder's statement to the Court would jeopardize my company, threaten my ability to earn a living, and, most importantly, impair my ability to continue pursuing this lawsuit. As a result, I spent several extremely stressful and anxiety-filled days scrambling to resolve the issue by paying the outstanding taxes and restoring my corporate status. This required urgently gathering the necessary funds on short notice, while also making multiple calls to the Franchise Tax Board to obtain information, confirm payment requirements, and ensure that my corporate status would be reinstated as quickly as possible. The entire process was exhausting, overwhelming, and mentally draining. I had to manage these urgent matters while continuing to work, which significantly increased the stress and disruption to my daily life.

10. My fear and stress were compounded when Ryder filed a counterclaim against my company, SLG, LLC alleging a breach of contract. Again, my company and my livelihood was in threatened. The counterclaim shocked and scared me and as a result, I had many sleepless and restless nights. I was unsure if I would have to pay a significant sum of money that would place me in severe financial hardship, all because I filed a lawsuit seeking to enforce my rights.

11. To date, I have not received any financial or other benefit as a result of bringing this action.

12. I do not have any conflicts of interest that would compromise my representative of the settlement class.

13. I have devoted considerable time to supporting this case and feel a sense of relief that it is coming to an end.

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Under the penalty of perjury under the laws of the State of California and the United States of America that the above is true and accurate and if called upon to do so, I would, and could, so testify.

Executed this 21st day of October 2026, in Highland, California.

DocuSigned by:

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EUDIER LEAÑO, Declarant