

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO.: 1:22-cv-20552-ALTONAGA/Torres

**JAMES THOMPSON, III, individually
and on behalf of all others
similarly situated,**

Plaintiff,

v.

RYDER SYSTEM, INC.,

Defendant.

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DECLARATION OF CHAD A. JUSTICE

I, Chad A. Justice, declare under penalty of perjury as follows:

1. Unless otherwise indicated, the facts set forth below are based on my personal knowledge and the opinions set forth herein are my own. I understand that this declaration under oath may be filed in the above captioned action.

2. I am the owner of Justice Litigation Associates, PLLC, and co-counsel in the above-styled case.

3. I am a licensed attorney in Florida and Michigan. I have been a member of the Florida Bar since April of 2016. I have been a member of the Michigan Bar since July 2020. I have a J.D. from Western Michigan University Thomas Cooley Law School, and a Bachelor's degrees from the University of Michigan.

4. I am admitted in the United States District Courts for the Middle and Southern District of Florida, Eastern District of Michigan, and the United States Court of Appeals for the Eleventh Circuit.

5. I have represented employers and employees in all stages of litigation in federal and state courts throughout Florida. In the Federal court alone I have served as co-counsel or lead counsel in 50+ federal cases.

6. I possess the requisite experience necessary to serve as class counsel in this case. I have been appointed as class counsel in multiple class actions, including cases involving a few hundred class members up to nearly one-hundred thousand class members.

7. Below is a list of class action cases I have been appointed as class counsel by the Court:

- *Molina et al v. Ace Homecare LLC*, 8:16-cv-02214-JDW-TGW (M.D. Fla) (appointed as class counsel in WARN Act case with approximately 500 class members);
- *Vazquez v. Marriott International, Inc.*, Case No.: 8:17-cv-00116-MSS-SPF (M.D. Fla) (appointed as class counsel in deficient COBRA notice case with 20,000 class members);
- *Valdivieso v. Cushman & Wakefield Inc.*, Case No.: 8:17-cv-00118-SDM-JSS (M.D. Fla) (appointed as class counsel in deficient COBRA notice case with 2,000+ class members);
- *Rigney et al v. Target Corporation*, Case No.: 8:19-cv-01432-MSS-JSS (M.D. Fla) (served as class counsel in deficient COBRA notice case with 92,000+ class members)
- *Luker v. Cognizant Technologies Solutions U.S. Corporation*, Case No.: 8:19-cv-01448-WFJ-JSS (M.D. Fla) (served as class counsel in wage case with 308 class members);
- *Boyd v. Task Management, Inc.*, Case No.: 8:20-cv-00780-MSS-JSS (M.D. Fla.) (appointed as class counsel in Fair Credit Reporting Act case involving 5,500 class members);
- *In re The Hertz Corporation, et al*, Case No.: 20-11218 (MFW) (Del. Bk.) (served as class counsel in WARN Act class action pursued in Bankruptcy court involving 6,000+ class members);
- *Kaintz v. The Goodman Group, Inc.*, 8:20-cv-02115-VMC-AAS (appointed as class counsel in deficient COBRA notice case with 2,889 class members);

- *Santiago et al v. University of Miami*, 1:20-cv-21784-DPG (appointed as class counsel in ERISA class action involving university retirement plan and approximately 20,000 class members).
- *Bermudez v. Westgate Resorts, Inc. et al.*, M.D. Fla. Case No. 6:19-cv-01847-RBD-DCI (appointed class counsel in FCRA case involving over 8,000 class members);

11. I am confident that the Class Representative, James Thompson (“Mr. Thompson”), will continue adequately representing the putative class members in this case.

12. At all times Mr. Thompson has actively participated in this case and represented the interests of the class members. He provided critical information utilized to draft the Complaint and Amended Complaint.

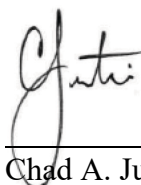
13. Mr. Thompson also attended mediation via Zoom, participated in settlement discussions, and has otherwise been available to answer questions from counsel and participate in this litigation. To my knowledge, no conflicts, disabling or otherwise, exist between Mr. Thompson and the putative class members.

14. I, along with my co-counsel, Luis A. Cabassa, Brandon J. Hill, and Amanda E. Heystek, have the desire, intention, financial resources, and ability to prosecute these claims in the face of strenuous opposition by Defendant. I also have no conflicts with any class members.

15. I support the Parties class action settlement as fair, reasonable, and adequate, and ask that the Court approve it.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 2nd day of June, 2023.



Chad A. Justice