

Exhibit E

Declaration of Daniel J. Leonard, D.O.

I, Daniel Leonard, declare as follows:

1. I am a pediatrician in Hastings, Nebraska. I am submitting this declaration to explain the significant negative impact that poor safety practices at Noah's Ark and other meatpacking plants have had and, absent changes, will continue to have on me, my patients, and medical practice.

2. I graduated from A.T. Still University Kirksville College of Osteopathic Medicine, after which I completed a residency in pediatrics at the University of South Florida Morsani College of Medicine and a fellowship in pediatric critical care medicine at Yale-New Haven Hospital. I am certified in pediatrics by the American Board of Pediatrics and licensed to practice medicine in Nebraska.

3. I co-own and work as a pediatrician at Children & Adolescent Clinic, a private practice with offices in Hastings and Grand Island, Nebraska. I am also the Director of the Neonatal Intensive Care Unit (NICU) at Mary Lanning Hospital in Hastings, and lead Mary Lanning's pediatric hospitalist service. I maintain an academic position with the Children's Hospital & Medical Center in Omaha and the University of Nebraska School of Medicine.

4. Children & Adolescent Clinic ("the Clinic") is the largest private pediatric primary care and specialty practice in Nebraska's Tri-Cities—Grand Island, Hastings, and Kearney.

5. The Clinic employs five physicians, including myself; five physician assistants; and thirty-two nurses and other staff.

6. The Clinic serves about 200 patients per week in our clinics in Hastings and Grand Island.

7. The Clinic also does all of the pediatric contract work at Mary Lanning Hospital, which is the largest hospital in the area. We serve between two and twelve patients at the hospital every day.

8. Approximately 42% of the Clinic's patients are eligible for Medicaid. The large majority of that group is Hispanic.

9. Appropriately two-thirds of the Clinic's patients are from Hastings or south of the I-80, and approximately one-third are from Grand Island.

10. A substantial number of the Clinic's patients report having family members who work at Noah's Ark.

11. The failure to adopt basic health and safety measures to reduce COVID-19 transmission at the Noah's Ark plant in Hastings would jeopardize my patients' health, my own safety as a physician, and my practice.

12. In March 2020, one of the Clinic's (now former) secretaries, who was married to an individual who worked at a meatpacking plant, became infected with COVID-19.

13. We had to contact every single patient who come into contact with that secretary during a nine-day period and inform them that she had COVID-19 and that they had been exposed and should take appropriate precautions.

14. The experience made clear that poor safety practices at other workplaces can render meaningless the safety precautions we maintain at the Clinic. Since the beginning of the pandemic, we have had clear expectations and practices for our staff regarding personal protective equipment, personal hygiene, and social distancing. But those practices cannot, and did not, keep our staff safe from becoming infected by spouses and family members who work at places like Noah's Ark that are not taking basic precautions.

15. As a result of the experience with our former secretary, the Clinic instituted policy changes to keep our staff and patients safe. If staff choose to attend family events or go to places with more than ten people, we have to carefully consider when or whether they can return to work.

16. Since the COVID-19 pandemic began, nearly 100 of our patients have tested positive.

17. In late March and early April, three infants younger than one month old tested positive for COVID-19. The guardians of each of the three reported that the children's fathers worked at meatpacking plants. The fathers became infected with COVID-19 at work, and then infected the mothers and babies. Thankfully, the babies were stable and did not require hospitalization, but the parents had to quarantine and were out of work for weeks.

18. I am very concerned that a new spike in COVID-19 cases at Noah's Ark will harm me, my patients, and my practice.

19. Mary Lanning Hospital, where I work, has about 147 beds, including 11 ICU beds and 12 NICU beds. In early April 2020, when COVID-19 cases first spiked in our area, the hospital reached capacity and maximum ventilator use on more than one occasion. We had to make decisions about which patients had to come off a ventilator based on who had the best chance at a better outcome.

20. During the first week of April 2020, the director of the adult ICU asked for all of the NICU's ventilators, because they were needed for adult COVID-19 patients. I was left with just one NICU ventilator for four to five days. I had to cross my fingers that we did not have premature twins or triplets during that time, because we would not have had enough ventilators for them.

21. During the initial spikes in April and May, Mary Lanning Hospital faced a shortage of personal protective equipment (PPE) like face masks and face shields.

22. The hospital also had to move the pediatric unit multiple times to accommodate the influx of adult COVID-19 patients.

23. If there is an outbreak at Noah's Ark, it will spread to the community and I may again be faced with not having enough hospital space, oxygen, ventilators, PPE, or suction devices for babies in the NICU.

24. The risk that our resources will be strained is particularly acute as winter and flu season approach. Currently, I admit about two children every day with respiratory syncytial virus (RSV). Most of our RSV patients need oxygen for several days, and they require a lot of pediatric staff. The prospect of having to treat RSV, flu, and COVID-19 outbreaks at all once is particularly daunting.

25. A spike in COVID-19 cases will also cause many of the Clinic's patients to delay or miss their well-child checks, either because they cannot risk exposing our staff and other patients to COVID-19 or because they cannot risk becoming infected themselves. Children who delay or miss their well-child checks will delay or miss routine vaccinations. As a result, we are likely to see a resurgence of vaccine-preventable illnesses, like the flu, pertussis, pneumonia, and meningitis. We will also see a rise in preventable diseases that could have been caught and treated in clinic visits, but will now require hospitalization, further adding to the stress on health care resources that will already be strained by a mounting COVID-19 surge.

26. COVID-19 testing is available in Hastings and Grand Island through insurance or for purchase. I do not know of a place for people without insurance to get a free test.

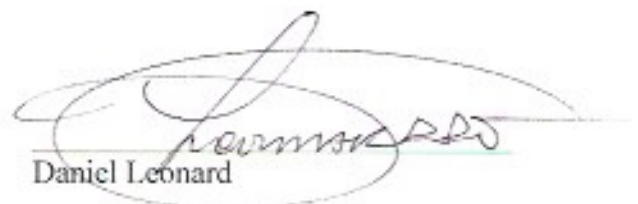
27. The Clinic uses a rapid antigen testing platform. Mary Lanning and CIII Health St. Francis in Grand Island also have the ability to do rapid antigen testing, and two of the three urgent care centers in Grand Island have rapid testing. These rapid tests produce results in the same day, usually within twenty minutes.

28. Health insurance, including Medicaid, typically covers the cost of a COVID-19 test. If an individual does not have health insurance, however, the out-of-pocket cost for a test is about \$150.

29. If a private company like Noah's Ark wanted to provide onsite testing, the company could reach out to the local public health department, which has supported employers who want to implement workplace testing.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: 01/DEC/2020



Daniel Leonard