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Attorneys for Plaintiff Evanina Alaniz, individually
and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

In re WATER WAGE AND HOUR CASES

Coordination Proceedings Special Title
(C.R.C. Rule 3.550)

Included Actions:

*Daniel Carillo-Salazar v. Watermark Services, IV,
LLC, et al.*

Orange County Superior Court
Case No. 30-2020-01126766-CU-OE-CXC

*Evanina Alaniz v. Watermark Retirement
Communities LLC, et al.,*

Los Angeles County Superior Court
Case No. 20STCV16386

*Katherine Greene v. Watermark Retirement
Properties, Inc., et al*

Monterey County Superior Court
Case No. 20CV002422

Judicial Counsel Coordination Proceedings No.
JCCP 5176

Assigned for all Purposes to the Honorable
William Claster, Dept. CX104

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

**DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, WALTER L. HAINES, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for Plaintiff Evanina Alaniz ("Plaintiff") in her lawsuit against Defendants Watermark Retirement Communities, LLC; Watermark Retirement Communities, Inc.; Watermark Services IV, LLC ("Defendants"). I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement. I make this Declaration based on my personal knowledge and if called to testify I could and would competently testify to the matters contained in this Declaration.

2. The Settlement Agreement in this action is the result of vigorous and competent representation of Plaintiff, and arms'-length, contentious negotiations with Defendant to reach the best possible outcome for the Class Members. Based on my experience as Class Counsel, I believe that the proposed Settlement is fair, reasonable, and adequate for the Class.

3. I am a highly experienced class action counsel specializing in actions of this nature. I have been practicing law for over 40 years and I am highly experienced in actions of this nature. I am the most senior attorney at my firm, United Employees Law Group, and worked on the litigation of this matter. I formed United Employees Law Group in 2005, primarily to represent employees in their wage claims. I have represented over 1,500 clients in wage and hour disputes of which more than 300 cases were class actions with settlements totaling over \$400,000,000. These class action cases include Fortune 500 companies such as Pepsi, Intel, Home Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co., Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

4. United Employees Law Group has prosecuted this litigation solely on a contingent-fee basis and has been completely at risk that it would not receive any compensation for

1 prosecuting claims against the defendants.

2 5. I have no conflicts of interest with the class or with the EVANINA ALANIZ. I am
3 not related to the representative plaintiff. I have not previously represented Defendants in any
4 matter. I do not represent opposing factions within the class in that all claims are predicated upon
5 the same theories of liability and benefit all class members equally.

6 6. In sum, I am well-suited to act as Class Counsel, will continue to vigorously
7 represent the interests of the class, and have adequate resources to do so.

8 I declare under the penalty of perjury of the laws of the State of California that the
9 foregoing is true and correct to the best of my knowledge.

10 Executed on 17:53 at Los Angeles, California.


WALTER L. HAINES,

12 Declarant