

1 DAVID G. SPIVAK (SBN 179684)
david@spivaklaw.com
2 CHRISTINA J. PREJEAN (SBN 314772)
christina@spivaklaw.com
3 MAYA CHEAITANI (SBN 335777)
maya@spivaklaw.com
4 THE SPIVAK LAW FIRM
5 8605 Santa Monica Bl
PMB 42554
6 West Hollywood, CA 90069
7 Telephone: (213) 725-9094
Facsimile: (213) 634-2485

8 Attorneys for Plaintiff(s),
9 CHARLES MIKICH, JONATHON GORDON, and all others similarly situated
10 (Additional attorneys for Plaintiff(s) on following page)

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF SAN FRANCISCO**
13 **(UNLIMITED JURISDICTION)**

14
15 CHARLES MIKICH, on behalf of himself and
16 all others similarly situated, and as an “aggrieved
17 employee” on behalf of other “aggrieved
Attorneys General Act of 2004,

18 *Plaintiff(s),*

19 vs.

20 SAYEH PETROLEUM, INC., a California
21 corporation; HEDIA PETROLEUM, INC., a
22 California corporation; HADAD ENTERPRISE,
23 INC., a California corporation; HADAD
24 PETROLEUM, INC., a California corporation;
BAY AREA AUTO CARE, INC., a California
25 corporation; HOUTAN PETROLEUM, INC. a
26 California corporation; GREEN PLANET GAS,
INC., a California corporation; ALI
BOZORGHADAD (also known as ED
BOZORGHADAD, also known as ED

Case No. CGC-20-582385 to be
consolidated with CGC-21-594289

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF
PLAINTIFFS CHARLES MIKICH
AND JONATHON GORDON’S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Date: October 20, 2022
Hearing Time: 8:30 a.m.
Hearing Dept.: 302

Action filed: January 22, 2020
Trial Date: Not Set



1 HADAD), an individual; and DOES 8-50,
2 inclusive,
Defendant(s).

3 JONATHON GORDON on behalf of himself and
4 all others similarly situated, and as an “aggrieved
5 employee” on behalf of other “aggrieved
6 employees” under the Labor Code Private
Attorney General Act of 2004,

7 *Plaintiff(s),*

8 vs.

9 SAYEH PETROLEUM, INC., a California
10 corporation; HEDIA PETROLEUM, INC., a
California corporation; HADAD ENTERPRISE,
11 INC., a California corporation; HADAD
PETROLEUM, INC., a California corporation;
12 BAY AREA AUTO CARE, INC., a California
corporation; HOUTAN PETROLEUM, INC. a
13 California corporation; GREEN PLANET GAS,
INC., a California corporation; ALI
14 BOZORGHADAD (also known as ED
BOZORGHADAD also known as ED HADAD),
15 an individual; and DOES 1-50, inclusive,

16 *Defendant(s).*

Case No.: CGC-21-594289

Action Filed: 08/04/2021

Dept: 610, Hon. Garrett L.
Wong



SPIVAK LAW
EMPLOYEE RIGHTS

ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)

WALTER L. HAINES (SBN 71075)

walter@uelglaw.com

UNITED EMPLOYEES LAW GROUP

4276 Katella Ave

Suite 301

Los Alamitos, CA 90720

Telephone: (562) 256-1047

Facsimile: (562) 256-1006

Attorneys for Plaintiff(s),

CHARLES MIKICH, JONATHON GORDON, and all others similarly situated



SPIVAK LAW
EMPLOYEE RIGHTS

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

3 I, WALTER L. HAINES, declare as follows:

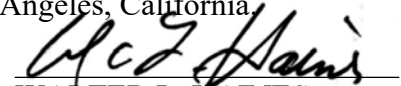
4 1. I am an attorney duly licensed to practice law in the State of California and am
5 an attorney of record for Plaintiffs Charles Mikich, Jonathon Gordon, and all others similarly
6 situated (collectively “Plaintiffs”) in his lawsuit against Defendants Sayeh Petroleum, Inc.,
7 Hedia Petroleum, Inc., Hadad Enterprise, Inc., Hadad Petroleum, Inc., Bay Area Auto Care, Inc.,
8 Houtan Petroleum, Inc., Ali Bozorghadad, and Green Planet Gas, Inc. (collectively
9 “Defendants”). I am a member in good standing of the State Bar of California. I make this
10 Declaration in support of Plaintiffs’ Motion for Preliminary Approval of Class Action
11 Settlement. I make this Declaration based on my personal knowledge and if called to testify I
12 could and would competently testify to the matters contained in this Declaration.

13 2. I am a highly experienced class action counsel specializing in actions of this
14 nature. I have been practicing law for over 40 years and I am highly experienced in actions of
15 this nature. I am the most senior attorney at my firm, United Employees Law Group, and worked
16 on the litigation of this matter. I formed United Employees Law Group in 2005, primarily to
17 represent employees in their wage claims. I have represented over 1,500 clients in wage and
18 hour disputes of which more than 300 cases were class actions with settlements totaling over
19 \$400,000,000. These class action cases include Fortune 500 companies such as Pepsi, Intel,
20 Home Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co.,
21 Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

22 3. I have no conflicts of interest with the class or with the Class Representative. I
23 am not related to the representative Plaintiffs. I have not previously represented Defendants in
24 any matter. I do not represent opposing factions within the class in that all claims are predicated
25 upon the same theories of liability and benefit all class members equally. In sum, I am well-
26 suited to act as Class Counsel and will continue to vigorously represent the interests of the class.

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

Executed on Thursday, September 22, 2022 at Los Angeles, California


WALTER L. HAINES,
Declarant



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