

1 DAVID GLENN SPIVAK (SBN 179684)

2 david@spivaklaw.com

3 THE SPIVAK LAW FIRM

4 8605 Santa Monica Bl

5 PMB 42554

6 West Hollywood, CA 90069

7 Telephone: (213) 725-9094

8 Facsimile: (213) 634-2485

9 Attorneys for Plaintiffs,

10 NAOMI MOJADDIDI, KIA SPURNEY, and all others similarly situated

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **FOR THE COUNTY OF SACRAMENTO**

13 **(UNLIMITED JURISDICTION)**

14 NAOMI MOJADDIDI, KIA SPURNEY, and
15 ANTOLIN NAJERA, on behalf of themselves
16 and all others similarly situated, the general
17 public, and as “aggrieved employees” on behalf
18 of other “aggrieved employees” under the Labor
19 Code Private Attorneys General Act of 2004,

20 *Plaintiff(s),*

21 vs.

22 ELITE DINERS, LLC, a California limited
23 liability company; ELITE DEVCO, LLC, a
24 California limited liability company; ELITE
25 SPORTS BAR GROUP, LLC, a California
26 corporation; SOCAL DINERS, LLC, a
27 California limited liability company; ELITE
28 BUSINESS ENTERPRISES, INC., a California
corporation; and DOES 1–50, inclusive,

Defendant(s).

Case No. 34-2020-00273090-CU-OE-GDS

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



SPIVAK LAW
EMPLOYEE RIGHTS

Mail:
8605 Santa Monica Bl
PMB 42554
West Hollywood, CA 90069
(213) 725-9094 Tel
(213) 634-2485 Fax
SpivakLaw.com

Office:
1875 Century Park East
Fl 7
Los Angeles, CA 90067

ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)

WALTER L. HAINES (SBN 71075)

walter@uelglaw.com

UNITED EMPLOYEES LAW GROUP

8605 Santa Monica Bl.

PMB 63354

West Hollywood, CA 90069

Telephone: (562) 256-1047

Facsimile: (562) 256-1006

Attorneys for Plaintiff(s),

NAOMI MOJADDIDI, KIA SPURNEY, and all others similarly situated

DAVID D. BIBIYAN (SBN 287811)

david@tomorrowlaw.com

VEDANG J. PATEL (SBN 328647)

vedang@tomorrowlaw.com

BIBIYAN LAW GROUP, P.C.

1460 Westwood Boulevard

Los Angeles, CA 90024

Telephone: (310) 438-5555

Facsimile: (310) 300-1705

Attorneys for Plaintiff(s),

ANTOLIN NAJERA, and all others similarly situated



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EMPLOYEE RIGHTS

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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 an
5 attorney of record for Plaintiffs Naomi Mojaddidi, Kia Spurney, and Antolin Najera (“Plaintiffs”)
6 in their lawsuit against Defendants Elite Diners, LLC, Elite Devco, LLC, Elite Sports Bar Group,
7 LLC, SoCal Diners, LLC, and Elite Business Enterprises, Inc. (“Defendants”). I am a member in
8 good standing of the State Bar of California. I make this Declaration in support of Plaintiffs’
9 Motion for Preliminary Approval of Class Action Settlement. I make this Declaration based on
10 my personal knowledge and if called to testify I could and would competently testify to the
11 matters contained in this Declaration.

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

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

26 4. I am not aware of any class, representative, or other collective action in any
27 other court, in this, or any other jurisdiction, that asserts claims similar to those asserted in
28 this action, on behalf of the class or group of individuals, some or all of whom would also be



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1 members of the class to find in this action other than the following. I have made a reasonable
2 inquiry of the other members of my law firm to determine whether they are aware of any
3 such similar actions. Based on these inquiries, I am aware of no such similar actions.

4 I declare under the penalty of perjury of the laws of the State of California that the
5 foregoing is true and correct.

6 Executed on Thursday, March 05, 2026 at Los Angeles, California.

7 
8 WALTER L. HAINES,
9 Declarant



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