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8
9 Attorneys for Plaintiff,
10 TINA CALDERON, and all others similarly situated

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

14 TINA CALDERON, on behalf of herself and as
15 an “aggrieved employee” on behalf of other
16 “aggrieved employees” under the Labor Code
Private Attorneys General Act of 2004,

17 *Plaintiff,*

18 vs.

19 DAVIS GUEST HOME, INC., a California
20 corporation; LONNY GENE DAVIS; and DOES
21 1–50, inclusive,

22 *Defendants.*
23

Case No. CV-20-001500

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
TINA CALDERON’S FIRST
AMENDED MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Hearing Date: October 20, 2022
Hearing Time: 8:30 a.m.
Hearing Dept.: 21, The Honorable John
R. Mayne

Action filed: March 05, 2020
Trial Date: Not Set



24 **SPIVAK LAW**

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ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)

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1 5. United Employees Law Group has participated in this litigation and has
2 performed work on behalf of Plaintiff since the inception of this litigation. The hours submitted
3 with this declaration are solely for work performed on behalf of the PAGA Members alleged in
4 the above-entitled California action and not any other state or federal matter.

5 6. I performed, among other things, the following tasks related to this matter:
6 analyzed initial clients' claims; performed initial investigation inclusive of research necessary
7 for case evaluation and searched court records relative to possible competing cases. I
8 participated in its mediation and settlement and reviewed all settlement papers along with orders
9 from the court, law and motion papers and assisted with client liaison and other tasks assigned
10 by lead counsel.

11 7. The hourly rate for my time is \$725.00 per hour which is my usual and customary
12 hourly rate charged for my services in similar complex class and representative actions.

13 8. The total number of hours spent by me on this litigation is 32.30 hours through
14 September 8, 2022.

15 9. My total lodestar amount through September 8, 2022 is \$23,417.50.

16 10. My out of pocket expenses for court fees are \$3.10. These fees are paid to various
17 courts to obtain records in order to determine if there is a similar case already on file in any court.
18 My out of pocket expenses for postage are \$8.00. I am not requesting any costs for photocopy,
19 Westlaw or LexisNexis or any future costs.

20 11. I believe that the Settlement is fair, adequate, and reasonable. The Settlement
21 provides substantial monetary benefits to PAGA Members and is a product of diligent efforts of
22 Plaintiff's Counsel to obtain the best possible result for the PAGA Members. This Settlement
23 was reached following thorough legal and factual research and analysis, thorough review of
24 extensive data relative to the claims in the action, arduous settlement negotiations, and thorough
25 investigation of the underlying facts by the respective parties and review of records. The
26 settlement negotiations were, at all times, adversarial and non-collusive in nature. The proposed
27 Settlement is within the range of reasonableness, and PAGA Members have supported the
28 Settlement.



SPIVAK LAW

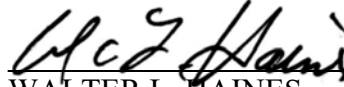
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1 I declare under the penalty of perjury of the laws of the State of California that the
2 foregoing is true and correct to the best of my knowledge.

3 Executed on Monday, September 19, 2022 at Los Angeles, California.

4 

5 WALTER L. HAINES,
6 Declarant



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