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Attorneys for Plaintiff JEANNIE LEFEVRE

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

JEANNIE LEFEVRE, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

AG ARCADIA, LLC, a California limited
liability company DBA HUNTINGTON
DRIVE HEALTH AND REHABILITATION
CENTER; and DOES 1 through 100, inclusive,

Defendants.

Case No. 20STCV05550

*[Assigned for all purpose to the Hon. Michael L.
Stern, Dept. 62]*

**DECLARATION OF PAUL K. HAINES IN
SUPPORT OF PLAINTIFF'S MOTION FOR
SETTLEMENT APPROVAL OF CLAIMS
BROUGHT UNDER THE PRIVATE
ATTORNEYS GENERAL ACT AND
REASONABLE ATTORNEYS' FEES, COSTS,
AND ENHANCEMENT AWARD**

Reservation ID: 712266163113

Date: March 2, 2021
Time: 8:30 a.m.
Dept.: 62

*[Filed concurrently with:
Notice of Motion and Motion for Settlement Approval
of Claims Brought Under the Private Attorneys
General Act and Reasonable Attorneys' Fees, Costs,
And Enhancement Award;
Declaration of Elizabeth Nguyen;
Declaration Scott M. Lidman;
Declaration of Milan Moore;
Declaration of Plaintiff Jeannie Lefevre;
Declaration of Jodey Lawrence of Phoenix Class
Action Administration Solutions;
[Proposed] Order and Judgment; and
Proof of Service]*

Action Filed: April 20, 2020
Trial Date: None Set

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Attorneys for Plaintiff JEANNIE LEFEVRE

1 I, PAUL K. HAINES, declare as follows:

2 1. I am principal of the law firm Haines Law Group, APC, and co-counsel for the named
3 Plaintiff Jeannie Lefevre (“Plaintiff”) in the above-captioned matter. I am a member in good standing of
4 the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of
5 the facts stated in this declaration and could testify competently to them if called upon to do so.

6 2. I am a 2006 graduate of Pepperdine University School of Law, where I graduated *cum*
7 *laude*. During law school, I worked as a law clerk for the appellate firm of Horvitz & Levy, located in
8 Encino, California. I also spent a semester in law school working as an extern for the Honorable Edward
9 Rafeedie, District Judge for the United States District Court for the Central District of California.

10 3. Since graduating from law school, my practice has focused exclusively on employment
11 litigation. In September 2007, I began working as an associate attorney at the international law firm of
12 Littler Mendelson P.C., at its Los Angeles office, which according to its website is the “largest U.S.-based
13 law firm exclusively devoted to representing management in every aspect of labor and employment law.”
14 While at Littler Mendelson, I was primarily staffed on wage and hour class actions venued in both state
15 and federal courts, and I also worked on a number of single and multi-plaintiff wage and hour matters as
16 well.

17 4. During my employment at Littler Mendelson, I played a significant role in the class actions
18 that I was staffed on, as I was often the only associate staffed on such cases. In particular, I received a
19 wide-array of wage and hour class action experience performing the following types of tasks: drafting
20 demurrers, motions to strike and/or dismiss; removing actions from state court to federal court; drafting
21 and responding to written discovery; drafting and opposing discovery related motions; arguing discovery
22 related motions; drafting motions to consolidate related matters; interviewing putative class members and
23 obtaining declarations in connection with class certification; drafting oppositions to motions for class
24 certification; drafting motions for decertification following class certification; conducting exposure
25 analyses to assess the strengths and weaknesses of asserted claims, the likelihood of prevailing at class
26 certification and potential damages resulting from such claims; drafting mediation briefs; serving as the
27 primary contact to in-house counsel; deposing named plaintiffs and putative class members; deposing
28 retained expert witnesses; and defending the depositions of corporate witnesses. In short, I played an

1 integral role in all aspects of litigation from the inception of a matter through and beyond class
2 certification. I also supervised the work of several junior attorneys who were staffed on the same wage
3 and hour class actions.

4 5. In June 2011, I voluntarily resigned from Littler Mendelson in order to accept an associate
5 attorney position with the international law firm of Morgan, Lewis & Bockius LLP, at its Los Angeles
6 office, where I began working in July 2011. During my employment at Morgan, Lewis & Bockius LLP,
7 I worked exclusively on the defense of wage and hour class and collective actions. For the vast majority
8 of these cases, I was the only associate staffed on the matter, and I performed the same job duties as
9 described in the immediately preceding paragraph. In addition to working on wage and hour class actions,
10 at Morgan, Lewis & Bockius I also worked on a number of “hybrid” actions asserting nationwide wage
11 and hour claims under the Fair Labor Standards Act (“FLSA”), as well as California-specific claims under
12 Rule 23 of the Rules of Civil Procedure.

13 6. In July 2012, I transitioned into litigating wage and hour class actions from the Plaintiff’s
14 side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since February 2016, as a
15 Shareholder of the Haines Law Group, APC. Currently, over ninety percent (90%) of my practice is
16 dedicated exclusively to the prosecution of wage and hour class actions, and I am currently responsible
17 for prosecuting over thirty (30) wage and hour class actions filed in both State and Federal courts
18 throughout California. Below are some of the matters in which I have been appointed as Class Counsel,
19 all of which have been granted final approval: Hilberger v. Eisenhower Medical Center, Case No.
20 INC1204915, California Superior Court, County of Riverside, Honorable Judge John G. Evans, presiding,
21 (in which I was approved for an hourly rate of \$500 for work performed in 2012 and 2013); Lopez v.
22 Cornucopia Tools and Plastics, Inc., Case No. CV138049, California Superior Court, County of San Luis
23 Obispo, Honorable Judge Martin J. Tangeman, presiding, (in which I was approved for an hourly rate of
24 \$425 for work performed in 2013 and 2014); Tacker v. Compass Health, Inc., Case No. CV13-02261 BRO
25 (JCG), United States District Court, Central District of California, Honorable Judge Beverly Reid
26 O’Connell, presiding, (in which I was approved for an hourly rate of \$500 for work performed in 2013
27 and 2014); Noell v. American Professional Ambulance Corporation, Inc., Case No. BC499345, California
28 Superior Court, County of Los Angeles, Honorable Judge Kenneth R. Freeman, presiding, (in which I was

1 approved for an hourly rate of \$500 for work performed in 2013 and 2014); Bautista v. Harvest
2 Management Sub LLC, Case No. CV12-10004 FMO (CWx), United States District Court, Central District
3 of California, Honorable Judge Fernando M. Olguin, presiding (in which I was approved for an hourly
4 rate of \$500 for work performed in 2012, 2013 and 2014); Davila v. OCB Restaurant Co., Case No. CV13-
5 5403 PA (JCG), United States District Court, Central District of California, Honorable Judge Percy
6 Anderson, presiding (in which I was approved for an hourly rate of \$500 for work performed in 2013 and
7 2014); Abad v. Waste Connections, Inc., Case No. CV12-06708 DDP (PJWx), United States District
8 Court, Central District of California, Honorable Judge Dean D. Pregerson, presiding (in which I was
9 approved for an hourly rate of \$500 for work performed in 2013 and 2014); Plantillas v. Snap-On
10 Incorporated, Case No. CV13-05153 DDP (VBKx), United States District Court, Central District of
11 California, Honorable Judge Dean D. Pregerson, presiding (in which I was approved for an hourly rate of
12 \$500 for work performed in 2013 and 2014); Theodore v. Keyes European, LLC, Case No. BC521395,
13 California Superior Court, County of Los Angeles, Honorable Judge Elihu Berle, presiding (in which I
14 was approved for an hourly rate of \$500 for work performed in 2013 and 2014); Morales v. Sunset Tower
15 Hotel LLC, Case No. BC511924, California Superior Court, County of Los Angeles, Honorable Judge
16 John Shepard Wiley Jr., presiding (in which I was approved for an hourly rate of \$500 for work performed
17 in 2013 and 2014); Gonzalez v. Universal Alloy Corp., Case No. SACV13-00807 JVS (MRWx), United
18 States District Court, Central District of California, Honorable Judge James V. Selna, presiding (in which
19 I was approved for an hourly rate of \$500 for work performed in 2013 and 2014); Morawski v. Milt Guggia
20 Enterprises, Inc., Case No. CV13-2349 ABC (RZx), United States District Court, Central District of
21 California, Honorable Judge Andre Birotte, Jr., presiding (in which I was approved for an hourly rate of
22 \$500 for work performed in 2013 and 2014); Thorp v. Alcal Industries, Inc., et al., Case No. CV13-02289
23 YGR, United States District Court, Northern District of California, Honorable Judge Yvonne Gonzalez
24 Rogers, presiding (in which I was approved for an hourly rate of \$500 for work performed in 2013 and
25 2014); Myles v. College Hospital, Case No. BC487206, California Superior Court, County of Los
26 Angeles, Honorable Judge John Shepard Wiley, Jr., presiding (in which I was approved for an hourly rate
27 of \$500 for work performed in 2013, 2014 and 2015); Sarinana v. DS Waters of America, Inc., Case No.
28 C13-0905 EMC, United States District Court, Northern District of California, Honorable Edward M.

1 Chen, presiding (in which I was approved for an hourly rate of \$550 for work performed in 2014 and
2 2015); Julio v. Anthony, Inc., Case No. CV14-03172 AB (SHx), United States District Court, Central
3 District of California, Honorable Judge Andre Birotte Jr., presiding (in which I was approved for an hourly
4 rate of \$550 for work performed in 2014 and 2015); Litt v. Western Stone & Metal Corp., Case No. 3:14-
5 cv-02804-PJH, United States District Court, Northern District of California, Honorable Judge Phyllis J.
6 Hamilton, presiding (in which I was approved for an hourly rate of \$550 for work performed in 2014 and
7 2015); Rubalcava v. United Towing and Transport Burbank, et al., Case No. BC518468, California
8 Superior Court, County of Los Angeles, Honorable Judge Kenneth Freeman, presiding (in which I was
9 approved for an hourly rate of \$550 for work performed in 2013, 2014 and 2015); Sanchez v. Res-Care,
10 Inc., Case No. BC526175, California Superior Court, County of Los Angeles, Honorable John S. Wiley,
11 presiding (in which I was approved for an hourly rate of \$550 for work performed in 2013, 2014 and
12 2015); Prado v. Warehouse Demo Services, Inc., Case No. CV14-3170 JFW (Ex), United States District
13 Court, Central District of California, Honorable Judge John F. Walter, presiding (in which I was approved
14 for an hourly rate of \$550 for work performed in 2014 and 2015); Rivera Regalado v. Jaguar Farm Labor
15 Contracting, Case No. CV 130569, California Superior Court, County of San Luis Obispo, Honorable
16 Martin J. Tangeman, presiding (in which I was approved for an hourly rate of \$550 for work performed
17 in 2014 and 2015); Rodas v. Gateways Hospital and Mental Health Center, Case No. BC503179,
18 California Superior Court, County of Los Angeles, Honorable Judge Amy D. Hogue, presiding (in which
19 I was approved for an hourly rate of \$550 for work performed in 2014 and 2015); Escobar v. Century
20 West, LLC, Case No BC564873, California Superior Court, County of Los Angeles, Honorable Judge
21 Jane L. Johnson, presiding (in which I was approved for an hourly rate of \$550 for work performed in
22 2014 and 2015 and 2016); Shaw v. Conant Auto Retail, San Diego, Case No. 37-2014-00044052-CU-OE-
23 CTL, California Superior Court, County of San Diego, Honorable Judge Joan M. Lewis, presiding
24 (approving an hourly rate of \$575 for work performed in 2014, 2015, and 2016); Tirado v. Ricon Corp.,
25 Case No. BC537042, California Superior Court, County of Los Angeles, Honorable John S. Wiley,
26 presiding (approving an hourly rate of \$575 for work performed in 2014, 2015, and 2016); and Horta v.
27 Searles Valley Minerals, Inc., Case No. CIVDS 1507615, California Superior Court, County of San
28 Bernardino, Honorable Donald Alvarez presiding (approving an hourly rate of \$575 for work performed

1 in 2015 and 2016); Cristobal v. Koos Manufacturing, Inc., Case No. BC591484, California Superior Court,
2 County of Los Angeles, Hon. William F. Highberger presiding (approving an hourly rate of \$575 for work
3 performed in 2015 and 2016); Rodriguez v. Spartan, Inc., Case No. BCV-15-100007-DRL, California
4 Superior Court, County of Kern, Honorable David R. Lampe presiding (approving hourly rate of \$575 for
5 work performed in 2015, 2016, and 2017); Kostyuk, et al. v. Golden State Overnight Delivery Service,
6 Inc., Case No. RG14727191, California Superior Court, Alameda County, Honorable Winifred Y. Smith
7 presiding (approving an hourly rate of \$575 for work performed in 2015, 2016, and 2017); Nunez v.
8 CompuCom Systems, Inc., Case No. BC618385, California Superior Court, County of Los Angeles,
9 Honorable Judge John Shepard Wiley, Jr., presiding (approved at an hourly rate of \$600 for work
10 performed in 2016 and 2017); Mansilla v. Haeco Americas Line Services, LLC, et al, Case No. BC615310,
11 Superior Court of California, County of Los Angeles, Honorable Judge Elihu M. Berle presiding
12 (approved at an hourly rate of \$600 for work performed in 2016 and 2017); Morales v. Caremeridian,
13 LLC, et al., Case No. BC593191, California Superior Court, County of Los Angeles, Judge William F.
14 Highberger presiding (granting final approval of settlement on behalf of direct support professionals
15 involving claims for unpaid wages, meal and rest period violations, wage statement violations, and other
16 claims).

17 7. I have also moved to certify and have received an order certifying a class action and/or
18 conditionally certifying a collective action, in the following cases:

- 19 • *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-CXC,
20 California Superior Court, County of Orange, Honorable Judge Gail A. Andler, presiding
21 (certifying a class of employees who were misclassified as independent contractors);
- 22 • *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United States
23 District Court, Central District of California, Honorable Judge Beverly Reid O'Connell, presiding
24 (conditionally certifying an unpaid FLSA overtime wage class);
- 25 • *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States District
26 Court, Central District of California, Honorable Judge John F. Walter, presiding (certifying a rest
27 period violation class and conditionally certifying an FLSA unpaid overtime wage class);

- 1 • *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court, Northern
2 District of California, Honorable Judge Haywood S. Gilliam, Jr., presiding (conditionally
3 certifying an unpaid FLSA overtime wage class);
- 4 • *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States District
5 Court, Eastern District of California, Honorable Jennifer L. Thurston, presiding (conditionally
6 certifying an unpaid FLSA overtime wage class);
- 7 • *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC, California
8 Superior Court, County of Orange, Honorable Judge William Claster, presiding (certifying unpaid
9 overtime wage class and waiting time penalty class); and
- 10 • *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United States
11 District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six
12 classes of employees for rest period violations, wage statement violations, meal period violations,
13 and overtime and double-time violations);
- 14 • *Vazquez, et al v. Kraft Heinz Foods Company*, Case No. 16-cv-2749-WQH-BLM, United States
15 District Court, Southern District of California, Honorable William Q. Hayes presiding (certifying
16 six classes of employees for unpaid wages, meal period violations, wage statement violations, and
17 waiting time penalties); and
- 18 • *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA, United
19 States District Court, Northern District of California, Honorable William H. Alsup presiding
20 (certifying three classes of employees for unlawful wage deduction violations, wage statement
21 violations, and waiting time violations).

22 8. In 2015, 2016 and 2017, Thomson Reuters and Los Angeles Magazine recognized me as a
23 Top Young Attorney in Southern California in the annual Rising Star Edition of Super Lawyer. This is
24 an honor awarded to no more than two and a half percent of attorneys under the age of forty in Southern
25 California each year. In 2018 and 2019 Thomson Reuters recognized me as a “Super Lawyer” in the
26 annual Super Lawyer magazine, an honor awarded to no more than five percent of all attorneys in Southern
27 California each year.
28

9. As co-counsel for Plaintiff, I have been intimately involved in this case from its inception through the present, and believe that the proposed Settlement is a reasonable result for the Aggrieved Employees.

10. Since undertaking representation of Plaintiff, my firm has borne the costs of litigation for over a year without receiving any compensation to date. To date, my firm and co-counsel's firm have \$17,397.41 in out-of-pocket costs reasonably incurred in litigating this matter, which includes anticipated costs of \$125 for filing fees, service and messenger fees, expenses for future court appearances, and/or postage, as set forth in Exhibit 4 attached to the declaration of Elizabeth Nguyen filed concurrently herewith.

11. My law firm maintains records of our hours worked on this case by billing our time in increments of one-tenth (1/10) of an hour into a timekeeping system. I access the timekeeping system regularly for purposes of assessing the number of attorney and paralegal hours worked for each case that my law firm handles. I relied on the timekeeping records for this case to prepare this declaration. The lodestar for my firm is \$10,660.00. A general summary showing the number of hours of work performed by my office:

Name	Billing Initials	Rate	Hours	Pre-Multiplier Lodestar
Paul K. Haines (15th Year Attorney)	PKH	\$650	16.4	\$10,660.00
Total Lodestar				\$10,660.00

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct. Executed on February 3, 2021 at El Segundo, California.


Paul K. Haines