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MIKAYLA HUDDLESTON
8 (Additional Counsel on Following Page)

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SACRAMENTO**
11 **(UNLIMITED JURISDICTION)**

12 MIKAYLA HUDDLESTON, as an
13 “aggrieved employee” on behalf of other
14 similarly situated “aggrieved employees”
under the Labor Code Private Attorney
15 General Act of 2004,

16 *Plaintiff(s),*

17 vs.

18 EASTER 263, INC., a California
19 corporation; and DOES 1 through 50,
inclusive,
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21 *Defendant(s).*
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Case No.: 34-2021-00295702

**DECLARATION OF WALTER L. HAINES
IN SUPPORT OF PLAINTIFF MIKAYLA
HUDDLESTON’S MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Action filed: 3/4/2021
Hearing Date: February 8, 2022
Hearing Time: 9:00 a.m.
Hearing Dept.: 54, Hon. Christopher E.
Krueger
Reservation ID: 2611118



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**DECLARATION OF WALTER HAINES IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PAGA SETTLEMENT**

I, Walter L. Haines, declare:

1. I am counsel of record for Plaintiff Mikayla Huddleston (hereafter referred to as "Plaintiff" or "Huddleston") in this action against Defendant Easter 263, Inc. ("Defendant"). I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiff's Motion for Approval of PAGA 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. I am highly experienced in class and representative action litigation 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 in 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.

3. I have no conflicts of interest with the Plaintiff or with the PAGA Settlement Employees. I am not related to any representative Plaintiff. I have not previously represented Defendant in any matter. I do not represent opposing factions within the PAGA Settlement Employees in that all claims are predicated upon the same theories of liability and benefit all PAGA Settlement Employees equally. In sum, I am well-suited to act as Plaintiff's counsel and will continue to vigorously represent the interests of the PAGA Settlement Employees.

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 prosecuting claims against the Defendant.

5. United Employees Law Group has participated in this litigation and has performed work on behalf of Plaintiff since the inception of this litigation.

6. I performed, among other things, the following tasks related to this matter: analyzed initial clients' claims; performed initial investigation inclusive of research necessary for



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1 case evaluation and searched court records relative to possible competing cases. I consulted with
2 co-counsel as to issues relating to the prosecution of this case, participated in its mediation and
3 settlement and reviewed all settlement papers along with orders from the court, law and motion
4 papers and assisted with client liaison and other tasks assigned by lead counsel.

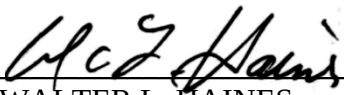
5 7. No charges have been included for paralegal or staff time spent on this matter.

6 8. Out of pocket expenses for court fees are \$12.00. My out of pocket expenses for
7 postage are \$12.00. Total out of pocket expenses are \$12.00.

8 9. I believe that the Settlement is fair, adequate, and reasonable. The Settlement
9 provides substantial monetary benefits to the PAGA Settlement Employees and is a product of
10 diligent efforts of Plaintiff's Counsel to obtain the best possible result for the PAGA Settlement
11 Employees. This Settlement was reached following thorough legal and factual research and
12 analysis, thorough review of extensive data relative to the claims in the action, arduous settlement
13 negotiations, and thorough investigation of the underlying facts by the respective parties and
14 review of records. The settlement negotiations were, at all times, adversarial and non-collusive in
15 nature. The proposed Settlement is within the range of reasonableness, and the PAGA Settlement
16 Employees have supported the Settlement.

17 I declare under penalty of perjury under the laws of the United States and California that
18 the foregoing is true and correct.

19 Executed on Monday, January 10, 2022 at Los Angeles, California.

20 

21 WALTER L. HAINES,
22 Declarant



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