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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA BARBARA

OLIVIA ROSE RAMIREZ and KRYSTAL
PECORARO, as individuals and on behalf of all
others similarly situated,

Plaintiffs,

v.

WYNDHAM VACATION OWNERSHIP, INC.,
a Delaware Corporation; and DOES 1-100,

Defendants.

Case No. 20CV01715

*[Assigned for all purposes to the Hon. James
F. Rigali, Dept. 2]*

**DECLARATION OF PAUL K. HAINES
IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: March 12, 2024
Time: 8:30 a.m.
Dept.: 2

Action Filed: April 17, 2020
Trial Date: None Set

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I, Paul K. Haines, declare as follows:

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

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

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

4. During my employment at Littler Mendelson, I played a significant role in the class actions that I was staffed on, as I was often the only associate staffed on such cases. In particular, I received a wide array of wage and hour class action experience performing the following types of tasks: drafting demurrers and motions to strike and/or dismiss; removing actions from state court to federal court; drafting and responding to written discovery; drafting and opposing discovery related motions; arguing discovery related motions; drafting motions to consolidate related matters; interviewing putative class members and obtaining declarations in connection with class certification; drafting oppositions to motions for class certification; drafting motions for decertification following class certification; conducting exposure analyses to assess

1 the strengths and weaknesses of asserted claims, the likelihood of prevailing at class certification,
2 and potential damages resulting from such claims; drafting mediation briefs; serving as the
3 primary contact to in-house counsel; deposing named plaintiffs and putative class members;
4 deposing retained expert witnesses; and defending the depositions of corporate witnesses. In
5 short, I played an integral role in all aspects of litigation from the inception of a matter through
6 and beyond class certification. I also supervised the work of several junior attorneys who were
7 staffed on the same wage and hour class actions.

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

17 6. In July 2012, I transitioned into litigating wage and hour class actions from the
18 Plaintiff’s side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since
19 February 2016 as a Shareholder of Haines Law Group, APC. Currently, over ninety percent (90%)
20 of my practice is dedicated exclusively to the prosecution of wage and hour class actions, and my
21 law firm is currently responsible for prosecuting over fifty (50) wage and hour class actions filed
22 in both State and Federal courts throughout California. I have been appointed as Class Counsel
23 in over seventy-five (75) wage and hour class action settlements in state and federal courts within
24 California. A few examples of the matters in which I have been appointed as Class Counsel, all
25 of which have been granted final approval, include the following: *Sanchez v. Res-Care, Inc.*, Case
26 No. BC526175, California Superior Court, County of Los Angeles, Honorable John S. Wiley,
27 presiding; *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United
28 States District Court, Central District of California, Honorable Judge John F. Walter, presiding;

1 *Tesla Motors Wage and Hour Litigation*, JCCP 4792, California Superior Court, Santa Clara
2 County, Judge Peter H. Kirwan presiding; *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG,
3 United States District Court, Northern District of California, Honorable Judge Haywood S.
4 Gilliam, Jr. presiding; *Longstreth v. PAQ, Inc., dba Food 4 Less*, Case No. 15CV-0206, California
5 Superior Court, County of San Luis Obispo, Honorable Judge Charles S. Crandall, presiding;
6 *Nunez v. CompuCom Systems, Inc.*, Case No. BC618385, California Superior Court, County of
7 Los Angeles, Honorable Judge John Shepard Wiley, Jr. presiding; *Mansilla v. Haeco Americas*
8 *Line Services, LLC, et al*, Case No. BC615310, Superior Court of California, County of Los
9 Angeles, Honorable Judge Elihu M. Berle presiding; *Khosravi v. Enterprise Rent-A-Car*
10 *Company of Los Angeles*, Case No. 30-2016-00829923-CU-OE-CXC, California Superior Court,
11 County of Orange, Judge Thierry Patrick Colaw, presiding (in which I was approved for an hourly
12 rate of \$600 for work performed in 2016 and 2017); *Nieves v. Ta Chen International, Inc.*, Case
13 No. BC609005, Superior Court of California, County of Los Angeles, Honorable Judge Kenneth
14 R. Freeman presiding (approved at an hourly rate of \$600 for work performed in 2016 and 2017);
15 *Berkel v. Pride Bakeries, LLC*, Case No. 30-2017-00923148-CU-OE-CXC, Superior Court of
16 California, County of Orange, Honorable Judge William Claster presiding; *Ruvalcaba Quiroz v.*
17 *Circle M Contractors, Inc.*, Case No. 30-2016-00885065-CU-OE-CXC, Superior Court of
18 California, County of Orange, Honorable William D. Claster presiding; *Armenta, et al., v.*
19 *California Friends Homes d/b/a Quaker Gardens*, Case No. 30-2016-00883282-CU-OE-CXC,
20 Superior Court of California, County of Orange, Honorable Randall J. Sherman presiding
21 (approving an hourly rate of \$600 for work performed in 2016, 2017 and 2018); *Tina Arellano v.*
22 *Williams Sonoma Stores, Inc.*, Case No. BC693760, Los Angeles County Superior Court,
23 Honorable Daniel J. Buckley, presiding (approving an hourly rate of \$650 for work performed in
24 2018 and 2019); *William Cuellar v. UMA Enterprises, Inc.*, Case No. BC657146, Los Angeles
25 County Superior Court, Honorable Maren E. Nelson, presiding (approving an hourly rate of \$650
26 for work performed in 2017, 2018 and 2019); *Maria C. Garcia, et al. v. Simplified Labor Staffing*
27 *Solutions, Inc.*, Case No. BC696898, Los Angeles County Superior Court, Honorable Elihu M.
28 Berle, presiding (approving an hourly rate of \$650 for work performed in 2018 and 2019); *Arturo*

1 *Delgado v. Spears Manufacturing Co.*, Case No. BC709665, Los Angeles County Superior Court,
2 Honorable Maren E. Nelson, presiding (approving an hourly rate of \$650 for work performed in
3 2018, 2019, and 2020); *Lucia Kang, et al., v. Extra Space Management, Inc.*, Case No. 30-2018-
4 00997364-CU-OE-CXC, Orange County Superior Court, Honorable William Claster, presiding;
5 *Ramon Soto v. L I Metal Systems*, Case No. 37-2017-00009607-CU-OE-CTL, San Diego County
6 Superior Court, Honorable Timothy Taylor, presiding (approving an hourly rate of \$650 for work
7 performed in 2017-2020); *Michael Fishback v. Paragon Framing, Inc.*, Case No.
8 CIVDS1906610, San Bernardino County Superior Court, Honorable David Cohn, presiding
9 (approving an hourly rate of \$650 for work performed in 2019 and 2020); *Carlos Perez v. Moss*
10 *Bros. Auto Group, Inc., et al.*, Case No. RIC1709905, Riverside County Superior Court,
11 Honorable Sunshine S. Sykes, presiding (approving an hourly rate of \$650 for work performed
12 in 2017-2019); *Francisco Garcia v. Searing Industries, Inc.*, Case No. CIVDS1932477, San
13 Bernardino County Superior Court, Honorable David Cohn, presiding (approving an hourly rate
14 of \$650 for work performed in 2019 and 2020); *Ahmad Teeba v. Brill, Inc.*, Case No.
15 CIVDS1923242, San Bernardino County Superior Court, Honorable David Cohn, presiding
16 (approving an hourly rate of \$650 for work performed in 2019-2021); *David Hasler, et al. v.*
17 *Anheuser-Busch, LLC*, Case No. 19STCV00802, Los Angeles County Superior Court, Honorable
18 Daniel J. Buckley, presiding; *Angel Ochoa v. Fonseca Construction, Inc.*, Case No.
19 CIVDS1928625, San Bernardino County Superior Court, Honorable David Cohn, presiding
20 (approving an hourly rate of \$650 for work performed in 2019 to 2021); *William Chang v. Avcorp*
21 *Composite Fabrication, Inc.*, Case No. BC715159, Los Angeles County Superior Court,
22 Honorable Amy D. Hogue, presiding (approving an hourly rate of \$650 for work performed in
23 2018 to 2021); *David Alvarado, et al. v. J.G. Boswell Company*, Case No. 19STCV19033, Los
24 Angeles County Superior Court, Honorable Daniel J. Buckley, presiding (approving an hourly
25 rate of \$650 for work performed in 2019 to 2021); *Alejandra Parra v. Sixty Collective, LLC*, Case
26 No. 19STCV01016, Los Angeles County Superior Court, Honorable Carolyn B. Kuhl, presiding
27 (approving an hourly rate of \$650 for work performed in 2019-2022); *Veronica Gonzalez v.*
28 *Precision Hospitality & Development, LLC*, Case No. 30-2020-01127597-CU-OE-CXC, Orange

County Superior Court, Honorable Randall J. Sherman, presiding (approving an hourly rate of \$650 for work performed in 2020-2021); *Steve Qawas v. Socal Framing, Inc.*, Case No RIC1902588, Riverside County Superior Court, Honorable Sunshin S. Sykes, presiding (approving an hourly rate of \$675 for work performed in 2019-2022); *Jessica Burrola v. Trademark Cosmetics, Inc.*, Case No. RIC2002311, Riverside County Superior Court, Honorable Sunshine S. Sykes, presiding (approving an hourly rate of \$675 for work performed in 2020-2022); *Elmy Calderon v. Personnel Staffing Group, LLC*, Case No. VCU278910, Tulare County Superior Court, Honorable David C. Mathias, presiding (approving an hourly rate of \$675 for work performed in 2019-2022); *Santos Orellana v. Smarte Carte, Inc.*, Case No. 20STCV08890, Los Angeles County Superior Court, Honorable Yvette M. Palazuelos, presiding (approving an hourly rate of \$675 for work performed in 2020-2022); *Luis Montanez v. MEI Rigging & Crating, LLC, et al.*, Case No. 21STCV04062, Los Angeles County Superior Court, Honorable Carolyn B. Kuhl, presiding (approving an hourly rate of \$675 for work performed in 2021-2022); *Ketema Nelson v. Santini Foods, Inc.*, Case No. RG21090890, Alameda County Superior Court, Honorable Evelio Grillo, presiding (approving an hourly rate of \$675 for work performed in 2021-2022); *Edward Salgado v. S.R. Bray LLC, dba Power Plus!, et al.*, Case No. 30-2020-01172134-CU-OE-CXC, Orange County Superior Court, Honorable Lon F. Hurwitz, presiding (approving an hourly rate of \$750 for work performed in 2020-2023); *Santiago Gutierrez v. M.M.C.L., Inc. dba California Landcare*, Case No. 30-2021-01182371-CU-OE-CXC, Honorable Randall J. Sherman, presiding (approving an hourly rate of \$750 for work performed in 2021-2023); *Robert Lewis v. IMERYS Filtration Minerals, Inc., et al.*, Case No. 22CV02874, Santa Barbara County Superior Court, Honorable Jed Beebe, presiding (approving an hourly rate of \$750 for work performed in 2021-2023); and *Gerardo Sanchez v. Dutton Home Services, LLC*, Case No. 22STCV01834, Los Angeles County Superior Court, Honorable Maren E. Nelson, presiding (approving an hourly rate of \$750 for work performed from 2022-2023).

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

- 1 • *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-
2 CXC, California Superior Court, County of Orange, Honorable Judge Gail A. Andler,
3 presiding (certifying a class of employees who were misclassified as independent
4 contractors);
- 5 • *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United
6 States District Court, Central District of California, Honorable Judge Beverly Reid
7 O'Connell, presiding (conditionally certifying an unpaid FLSA overtime wage class);
- 8 • *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States
9 District Court, Central District of California, Honorable Judge John F. Walter, presiding
10 (certifying a rest period violation class and conditionally certifying a FLSA unpaid
11 overtime wage class);
- 12 • *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court,
13 Northern District of California, Honorable Judge Haywood S. Gilliam, Jr., presiding
14 (conditionally certifying an unpaid FLSA overtime wage class);
- 15 • *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States
16 District Court, Eastern District of California, Honorable Jennifer L. Thurston, presiding
17 (conditionally certifying an unpaid FLSA overtime wage class);
- 18 • *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC,
19 California Superior Court, County of Orange, Honorable Judge William Claster, presiding
20 (certifying unpaid overtime wage class and waiting time penalty class);
- 21 • *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-775372-CU-OE-CXC,
22 California Superior Court, County of Orange, Honorable Glenda Sanders, presiding
23 (certifying piece rate pay plan classes, expense reimbursement class, wage statement
24 class, and waiting time penalties class);
- 25 • *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United
26 States District Court, Central District of California, Honorable Dolly M. Gee presiding
27 (certifying six classes of employees for rest period violations, wage statement violations,
28 meal period violations, and overtime and double-time violations);

- *Vasquez v. Kraft Heinz Foods Company*, Case No. 16-cv-2749-WQH-BLM, United States District Court, Southern District of California, Honorable William Q. Hayes presiding (certifying classes for automatic meal period deductions, manual time deductions, late meal periods, and derivative wage statement and waiting time penalties);
- *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA, United States District Court, Northern District of California, Honorable William H. Alsup presiding (certifying three classes of employees for unlawful wage deduction violations, wage statement violations, and waiting time violations);
- *Barbara J. Bowlin-Burdick v. Life Care Centers of America, Inc.*, Case No. BC657139, Los Angeles County Superior Court, Honorable Maren E. Nelson, presiding (certifying classes for late meal period violations, on-remises rest period violations, wage statement violations, and waiting time violations);
- *Staublein v. Wells Fargo Bank, National Association*, Case No. CIVDS1712267, San Bernardino County Superior Court, Honorable David Cohn, presiding (certifying a wage statement class);
- *Danica N. Keich, et al. v. U.S. Healthworks, Inc., et al.*, Case No. 37-2017-00015343-CU-OE-CTL, San Diego County Superior Court, Honorable Eddie C. Sturgeon, presiding (certifying classes for rest period violations, meal period violations, on-call pay violations, wage statement violations, and waiting time violations); and
- *George Gomez v. The Bedrock Company*, Case No. CIVDS1824255, San Bernardino County Superior Court, Honorable David Cohn, presiding (certifying claims for unpaid overtime and minimum wage violations, meal period violations, rest period violations, wage statement violations, and waiting time penalties).

8. In April 2019, I served as trial counsel for the Plaintiff in the matter of *Calhoun v. Aqua Tech Water Management Inc.*, Case No. BS169815, Los Angeles County Superior Court, Honorable Theresa M. Traber presiding, which was an individual wage-and-hour case that resulted in a six-figure verdict in favor of Plaintiff.

9. In every year from 2015 through 2017, Thomson Reuters recognized me as a Top

1 Young Attorney in Southern California in the annual Rising Stars Edition of Super Lawyer. This
2 is an honor awarded to no more than two-and-a-half percent of attorneys under the age of forty in
3 Southern California each year. In every year from 2018 through 2023, Thomson Reuters
4 recognized me as a “Super Lawyer” in the annual Super Lawyer magazine, an honor awarded to
5 no more than five percent of all attorneys in Southern California each year.

6 10. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation
7 since its inception. The details of the work completed by Class Counsel in this case are set forth
8 in the declaration of Fletcher W. Schmidt, filed concurrently herewith.

9 11. I confirm that I am not affiliated with the proposed settlement administrator, CPT
10 Group, Inc.

11 I declare under penalty of perjury under the laws of California and the United States that
12 the foregoing is true and correct. Executed on February 16, 2024, at El Segundo, California.

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14 
15 Paul K. Haines