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8 ANTHONY SIKES, and all others similarly situated
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9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SOLANO**
12 **(UNLIMITED JURISDICTION)**

13 ANTHONY SIKES, on behalf of himself, all
14 others similarly situated, the general public, and
15 as an “aggrieved employee” on behalf of other
“aggrieved employees” under the Labor Code
Private Attorneys General Act of 2004,

16 *Plaintiff(s),*

17
18 vs.

19 WING DHABA, INC., a California corporation;
20 2 SINGHS HAVE WINGS, INC., a California
corporation; DAD'S SAPNA INC., a California
21 corporation; PKA CORPORATION, a
California corporation; WINGS FOR 2 SINGHS
22 INC, a California corporation; BIKRAMJIT
SINGH RANDHAWA, an individual; and
23 DOES 1–50, inclusive,

24 *Defendant(s).*
25
26
27
28

Case No. FCS054490

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
ANTHONY SIKES’S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: 4/26/2023
Hearing Time: 9:30 a.m.
Hearing Dept.: 8, The Honorable Wendy
G. Getty

Action filed: March 05, 2020



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10 ANTHONY SIKES, and all others similarly situated



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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
5 an attorney of record for Plaintiff Anthony Sikes (“Plaintiff”) in his lawsuit against Defendants
6 Wing Dhaba, Inc., 2 Singhs Have Wings, Inc., Dad's Sapna, Inc., PKA Corporation, Wings For
7 2 Singhs Inc., and Bikramjit Singh Randhawa (collectively “Defendants”). I am a member in
8 good standing of the State Bar of California. I make this Declaration in support of Plaintiff’s
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
14 this nature. I am the most senior attorney at my firm, United Employees Law Group, and worked
15 on the litigation of this matter. I formed United Employees Law Group in 2005, primarily to
16 represent employees in their wage claims. I have represented over 1,500 clients in wage and
17 hour disputes of which more than 300 cases were class actions with settlements totaling over
18 \$400,000,000. These class action cases include Fortune 500 companies such as Pepsi, Intel,
19 Home Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co.,
20 Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

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

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

28 Executed on Friday, March 31, 2023 at Los Angeles, California.


WALTER L. HAINES,
Declarant



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