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13 Attorneys for Plaintiff,
14 JOSE LOZANO SANDOVAL, and all others similarly situated

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **FOR THE COUNTY OF SAN BERNARDINO**

17 **(UNLIMITED JURISDICTION)**

18
19 JOSE LOZANO SANDOVAL, on behalf of
20 himself and all others similarly situated, and the
general public,

21 *Plaintiff,*

22 vs.

23
24 AMERICAN LANDSCAPE &
MAINTENANCE INC., a California corporation;
and DOES 1–50, inclusive,

25
26 *Defendants.*

Case No. CIVDS2011904

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
JOSE LOZANO SANDOVAL'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**



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**DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, WALTER L. HAINES, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for Plaintiff Jose Lozano Sandoval ("Plaintiff") in his lawsuit against Defendant American Landscape & Maintenance 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 Preliminary Approval of Class Action 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 a highly experienced class action counsel 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 at 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 class or with the Jose Lozano Sandoval. I am not related to the representative plaintiff. I have not previously represented Defendant in any matter. I do not represent opposing factions within the class in that all claims are predicated upon the same theories of liability and benefit all class members equally. In sum, I am well-suited to act as the attorneys representing Plaintiff in the Action: David G. Spivak of The Spivak Law Firm and Walter L. Haines of United Employees Law Group and will continue to vigorously represent the interests of the class.

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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.

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4 Executed on Friday, August 19, 2022 at Los Angeles, California.

5 *W. L. Haines*

6 WALTER L. HAINES,
7 Declarant
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