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Attorneys for Plaintiff

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

SANTOS ORELLANA, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SMARTE CARTE, INC., a Minnesota
corporation; and DOES 1 through 100,

Defendants.

Case No.: 20STCV08890

*[Assigned for all purposes to the Hon. Yvette
M. Palazuelos, Dept. SSC-9]*

**DECLARATION OF MATTHEW K.
MOEN IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: September 14, 2021

Time: 10:00 a.m.

Dept.: SSC-9

Action Filed: March 5, 2020

Trial Date: None Set

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I, MATTHEW K. MOEN, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Santos Orellana (“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 received a Bachelor of Arts degree from UCLA in 2011, and a Juris Doctor from Loyola Law School, Los Angeles, in 2015. Both before and during law school, I worked for the law firm of Prindle, Amaro, Goetz, Hillyard, Barnes & Reinholtz LLP (now known as Prindle, Goetz, Barnes & Reinholtz LLP), located in Long Beach, California. Both before and during law school, I also worked for Jill McBride Baxter, Certified Sports Agent and Sports Law Attorney.

3. From January 2016 to December 2017, I worked as an associate at Baltodano & Baltodano LLP, a law firm dedicated exclusively to the practice of Plaintiff-side employment law located in San Luis Obispo, California. After the co-founder and lead litigation attorney at Baltodano & Baltodano LLP, the Honorable Hernaldo J. Baltodano, was appointed to the California judiciary in December 2017, the firm dissolved on December 31, 2017. Since January 1, 2018, I have worked as an associate at my current firm, Haines Law Group, APC.

4. During my time with both Baltodano & Baltodano LLP and Haines Law Group, APC, my practice has been solely devoted to litigating plaintiff-side employment related cases in both state and federal court, including wage and hour class actions arising under the California Labor Code and the Fair Labor Standards Act. I am currently staffed on over fifty (50) active wage and hour class actions in which I am integrally involved in all aspects of the litigation.

5. The following is a non-exhaustive list of the recent wage and hour class actions (that have been granted final approval) in which I have been named as Class Counsel: *Morales v. Ball Horticultural Co.*, Case No. 16CV-0488, San Luis Obispo County Superior Court,

1 Honorable Linda D. Hurst, presiding (approving an hourly rate of \$375 for work performed in
2 2017 and 2018); *Ruvalcaba Quiroz v. Circle M Contractors, Inc.*, Case No. 30-2016-00885065-
3 CU-OE-CXC, Orange County Superior Court, Honorable William D. Claster, presiding;
4 *Armenta, et al., v. California Friends Homes d/b/a Quaker Gardens*, Case No. 30-2016-
5 00883282-CU-OE-CXC, Orange County Superior Court, Honorable Randall J. Sherman,
6 presiding; *Willie Daniel Myers, Jr. v. Jerome's Furniture Warehouse*, Case No. CIVDS
7 1715069, San Bernardino County Superior Court, Honorable Janet M. Frangie, presiding
8 (approving an hourly rate of \$375 for work performed in 2018 and 2019); *Tina Arellano v.*
9 *Williams Sonoma Stores, Inc.*, Case No. BC693760, Los Angeles County Superior Court,
10 Honorable Daniel J. Buckley, presiding (approving an hourly rate of \$375 for work performed
11 in 2018 and 2019); *William Cuellar v. UMA Enterprises, Inc.*, Case No. BC657146, Los
12 Angeles County Superior Court, Honorable Maren E. Nelson, presiding (approving an hourly
13 rate of \$375 for work performed in 2018 and 2019); *Arturo Delgado v. Spears Manufacturing*
14 *Co.*, Case No. BC709665, Los Angeles County Superior Court, Honorable Maren E. Nelson,
15 presiding (approving an hourly rate of \$400 for work performed in 2018, 2019, and 2020);
16 *Abbygail Hernandez v. WirelessPCS CA, LLC*, Case No. BC721326, Los Angeles County
17 Superior Court, Honorable Carolyn B. Kuhl, presiding; *Lucia Kang, et al., v. Extra Space*
18 *Management, Inc.*, Case No. 30-2018-00997364-CU-OE-CXC, Orange County Superior Court,
19 Honorable William Claster, presiding (approving an hourly rate of \$400 for work performed in
20 2018, 2019, and 2020); *Fishback v. Paragon Framing, Inc.*, Case No. CIVDS1906610, San
21 Bernardino County Superior Court, Honorable David Cohn, presiding (approving an hourly rate
22 of \$400 for work performed in 2019 and 2020); *Francisco Garcia v. Searing Industries, Inc.*,
23 Case No. CIVDS1932477, San Bernardino County Superior Court, Honorable David Cohn,
24 presiding (approving an hourly rate of \$400 for work performed in 2019 and 2020); *David*
25 *Hasler, et al. v. Anheuser-Busch, LLC*, Case No. 19STCV00802, Los Angeles County Superior
26 Court, Honorable Daniel J. Buckley, presiding; and *Angel Ochoa v. Fonseca Construction, Inc.*,
27 Case No. CIVDS1928625, San Bernardino County Superior Court, Honorable David Cohn,
28 presiding (approving an hourly rate of \$400 for work performed in 2019 to 2021).

6. I have also moved to certify, and have received an order certifying, a class action as Class Counsel in the following case: *Staublein v. Wells Fargo Bank, National Association*, Case No. CIVDS1712267, San Bernardino Superior Court, Honorable David Cohn, presiding (certifying a wage statement class).

7. In 2020 and 2021, Thomson Reuters and Los Angeles Magazine recognized me as a Top Young Attorney in Southern California in the annual Rising Star Edition of Super Lawyers. This is an honor awarded to no more than two-and-a-half percent (2.5%) of attorneys under the age of forty in Southern California each year.

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

I declare under penalty of perjury under the laws of the United States and the state of California that the foregoing is true and correct. Executed on June 22, 2021, at El Segundo, California.


Matthew K. Moen