

1 DAVID G. SPIVAK (SBN 179684)
david@spivaklaw.com
2 CHRISTINA PREJEAN (SBN 314772)
christina@spivaklaw.com
3 MAYA CHEAITANI (SBN 335777)
maya@spivaklaw.com
4 THE SPIVAK LAW FIRM
5 8605 Santa Monica Blvd., PMB 42554
West Hollywood, CA 90069
6 Telephone: (213) 725-9094
7 Facsimile: (213) 634-2485

8 Attorneys for Plaintiff(s),
JENNIFER WISE, and all others similarly situated
9 (Additional attorneys for Plaintiff(s) on following page)

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF RIVERSIDE**
12 **(UNLIMITED JURISDICTION)**

13 JENNIFER WISE, on behalf of herself and all
14 others similarly situated, and as an “aggrieved
15 employee” on behalf of other “aggrieved
16 employees” under the Labor Code Private
Attorneys General Act of 2004,

17 *Plaintiff(s),*

18 vs.

19 SPRINGS CHARTER SCHOOLS, INC., a
20 California corporation; RIVER SPRINGS
21 CHARTER SCHOOL, INC., a California
corporation; and DOES 1-50, inclusive,

22 *Defendant(s).*

Case No. RIC2002359

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

Hearing Date: December 14, 2022
Hearing Time: 8:30 a.m.
Reservation ID: 590106029795
Hearing Dept.: 1, The Honorable Craig
Riemer
Action filed: July 01, 2020



SPIVAK LAW
Employee Rights Attorneys

Mail:
8605 Santa Monica Bl
PMB 42554
West Hollywood, CA 90069
(213) 725-9094 Tel
(213) 634-2485 Fax
SpivakLaw.com

Office:
15303 Ventura Bl
Ste 900
Sherman Oaks, CA 91403

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ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)

WALTER L. HAINES (SBN 71075)
walter@uelglaw.com
UNITED EMPLOYEES LAW GROUP
4276 Katella Ave., Suite 301
Los Alamitos, CA 90720
Telephone: (562) 256-1047
Facsimile: (562) 256-1006

Attorneys for Plaintiff(s),
JENNIFER WISE, and all others similarly situated



SPIVAK LAW
Employee Rights Attorneys

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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 Jennifer Wise (“Plaintiff”) in her lawsuit against Defendants
6 Springs Charter Schools, Inc. and River Springs Charter School, Inc. (collectively
7 “Defendants”). I am a member in good standing of the State Bar of California. I make this
8 Declaration in support of Plaintiff’s Motion for Preliminary Approval of Class Action
9 Settlement. I make this Declaration based on my personal knowledge and if called to testify I
10 could and would competently testify to the matters contained in this Declaration.

11 2. I am a highly experienced class action counsel specializing in actions of this
12 nature. I have been practicing law for over 40 years and I am highly experienced in actions of
13 this nature. I am the most senior attorney at my firm, United Employees Law Group, and worked
14 on the litigation of this matter. I formed United Employees Law Group in 2005, primarily to
15 represent employees in their wage claims. I have represented over 1,500 clients in wage and
16 hour disputes of which more than 300 cases were class actions with settlements totaling over
17 \$400,000,000. These class action cases include Fortune 500 companies such as Pepsi, Intel,
18 Home Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co.,
19 Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

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

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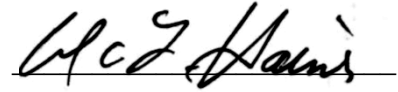
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1 I declare under the penalty of perjury of the laws of the State of California that the
2 foregoing is true and correct to the best of my knowledge.

3 Executed on Friday, September 30, 2022 at Los Angeles, California.

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5 
6 WALTER L. HAINES,
7 Declarant



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