

1 DAVID G. SPIVAK (SBN 179684)
david@spivaklaw.com

2 MAYA CHEAITANI (SBN 335777)
maya@spivaklaw.com

3 THE SPIVAK LAW FIRM

4 8605 Santa Monica Bl

PMB 42554

5 West Hollywood, CA 90069

6 Telephone: (213) 725-9094

Facsimile: (213) 634-2485

7 Attorneys for Plaintiff(s),

8 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 others
14 similarly situated, and as an "aggrieved employee"
15 on behalf of other "aggrieved employees" under the
Labor Code Private Attorneys General Act of 2004,

16 *Plaintiff(s),*

17 vs.

18
19 SPRINGS CHARTER SCHOOLS, INC., a
California corporation; RIVER SPRINGS
20 CHARTER SCHOOL, INC., a California
corporation; EMPIRE SPRINGS CHARTER
21 SCHOOL, INC., a California corporation;
22 HARBOR SPRINGS CHARTER SCHOOL, INC.,
a California corporation; CITRUS SPRINGS
23 CHARTER SCHOOL, INC., a California
corporation; VISTA SPRINGS CHARTER
24 SCHOOL, INC., a California corporation; PACIFIC
25 SPRINGS CHARTER SCHOOL, INC., a California
corporation and DOES 1-50, inclusive,

26 *Defendants.*

Case No. RIC2002359

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

Hearing Date: April 18, 2023

Hearing Time: 8:30 a.m.

Hearing Dept.: 1, The Honorable Craig
G. Riemer

Action filed: July 01, 2020

Trial Date:



SPIVAK LAW
EMPLOYEE RIGHTS

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

Office:
1801 Century Park East
25th Fl
Los Angeles, CA 90067

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

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

Office:
1801 Century Park East
25th Fl
Los Angeles, CA 90067

1 **SUPPLEMENTAL DECLARATION OF WALTER L. HAINES IN SUPPORT OF**
2 **MOTION FOR 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 an
5 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 Settlement.
9 I make this Declaration based on my personal knowledge and if called to testify I could and
10 would competently testify to the matters contained in this Declaration.

11 2. In accordance with Code of Civil Procedure section 384, subdivision (b), the
12 Parties selected Legal Aid at Work over other potential recipients considered because it is a
13 nonprofit organization which has provided high-quality civil legal services to the indigent for
14 more than four decades and has devoted its resources to protecting the rights of California low-
15 wage workers.

16 3. To the best of my knowledge, there exists no relationship between the proposed
17 recipient and (1) any class representative or other party, (2) any officer, director, or manager of
18 any party, or (3) any attorney or law firm for any party. I conducted my due diligence in
19 determining whether there is any such relationship through having my office verify with Legal
20 Aid at Work and with Defense Counsel, in determining whether any such relationship exists. *See*
21 also Joan Graff Declaration ("Graff Decl.")

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

24 Executed on April 10, 2023 at Los Angeles, California.

25 
26 WALTER L. HAINES,
27 Declarant
28



SPIVAK LAW
EMPLOYEE RIGHTS

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

Office:
1801 Century Park East
25th Fl
Los Angeles, CA 90067