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

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

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

17 *Plaintiff(s),*

18
19 vs.

20 PEACH STATE ROOFING, INC., a Georgia
21 corporation; MARTIN KELLY, an individual;
CHRIS KELLY, and individual; and DOES 1
22 through 50, inclusive,

23 *Defendant(s).*
24

Case No. 20STCV20397

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

Hearing Date: October 18, 2022
Hearing Time: 10:00 a.m.
Hearing Dept.: 14, The Honorable
Kenneth R. Freeman

Action filed: May 28, 2020



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ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)

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ANDREW BURDICK, 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 Andrew Burdick (“Plaintiff”) in his lawsuit against Defendants
6 Peach State Roofing, Inc., Martin Kelly, Chris Kelly (“Defendants”). I am a member in good
7 standing of the State Bar of California. I make this Declaration in support of Plaintiff’s Motion
8 for Preliminary Approval of Class Action Settlement. I make this Declaration based on my
9 personal knowledge and if called to testify I could and would competently testify to the matters
10 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 Andrew Burdick. I am not
21 related to the representative plaintiff. I have not previously represented Defendants in any
22 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 shall mean the attorneys representing Plaintiff in the Action: David G. Spivak of
25 The Spivak Law Firm and Walter L. Haines of United Employees Law Group and will continue
26 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.

3 Executed on Friday, September 16, 2022 at Los Angeles, California.

4 
5 WALTER L. HAINES,
6 Declarant



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