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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA**

CHEYENNE ROBLES, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

WESTERN STONE & METAL CORP., a
Colorado corporation; and DOES 1 through
100,

Defendants.

Case No.: MSC20-00392

*[Case assigned for all purposes to the Hon.
Edward G. Weil, Dept. 39]*

**DECLARATION OF ALEXANDRA R.
MCINTOSH IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: TBD

Time:

Dept.: 39

Action Filed: February 26, 2020

Trial Date: None Set

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I, Alexandra R. McIntosh, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Cheyenne Robles (“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 University of California, Santa Barbara in 2012, and a Juris Doctor from University of California, Irvine School of the Law in 2017. I was admitted to the California State Bar in June 2018. During law school, I worked at the plaintiff's employment law firm of Ackermann & Tilajef, P.C., where I assisted in representing clients in individual wrongful termination and retaliation lawsuits as well as wage and hour class actions. I also externed for Legal Aid at Work in their Wage Protection program, where I was responsible for representing employees at hearings in front of the Labor Commissioner and assisted with litigating wage and hour class actions and representative PAGA actions.

3. After graduating from law school, I worked for Lara & Luna, APC, a plaintiffs-side employment law firm, from June 2018 until March 2019. From March 2019 until March 2020, I worked as an associate at the employment law firm of Setareh Law Group. The vast majority of my work at both Lara & Luna APC and Setareh Law Group focused on representing employees in wage and hour and wrongful termination actions, including wage and hour class actions. Although non-exhaustive, the types of work I performed at those firms include: conducting client intakes; performing pre-filing research and analysis; drafting complaints; attending court hearings; corresponding with opposing counsel; drafting and responding to written discovery; preparing for and taking and defending depositions; analyzing payroll and timekeeping records and employee handbooks; drafting and opposing a variety of motions including motions for summary judgment, motions for remand, demurrers and motions to dismiss, motions to compel, and motions to decertify; drafting mediation briefs and attending mediations;

1 drafting long-form settlement agreements; drafting motions for preliminary and final settlement
2 approval; and overseeing the claims and/or opt-out processes.

3 4. Since April 2020 I have worked as an associate at my current firm, Haines Law
4 Group, APC. I am currently staffed on approximately thirty (30) active wage and hour class
5 actions in which I play a significant role.

6 5. As counsel for Plaintiff, I have been closely involved in all aspects of this
7 litigation. The details of the work completed by Class Counsel in this case are set forth in the
8 declaration of Fletcher W. Schmidt, filed concurrently herewith.

9 I declare under penalty of perjury under the laws of California and the United States that
10 the foregoing is true and correct. Executed on January 4, 2021, at El Segundo, California.

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Alexandra R. McIntosh