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CARLOS CHACON

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

CARLOS CHACON, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

EXEMPLIS LLC, a California limited liability
company; and DOES 1 through 100, inclusive,
Defendants.

Case No. 30-2020-01157341-CU-OE-CXC

*[Assigned for All Purposes to Hon. Randall J.
Sherman, CX105]*

**DECLARATION OF PAUL K. HAINES
IN SUPPORT OF PLAINTIFF'S
MOTION FOR SETTLEMENT
APPROVAL OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT AND REASONABLE
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT AWARD**

Date: August 27, 2021
Time: 10:00 a.m.
Dept.: CX105

Reservation No.: 73578931

Complaint Filed: August 27, 2020
Trial Date: None Set

DECLARATION OF PAUL K. HAINES IN SUPPORT OF PLAINTIFF'S MOTION FOR SETTLEMENT APPROVAL
OF CLAIMS BROUGHT UNDER THE PRIVATE ATTORNEYS GENERAL ACT AND REASONABLE
ATTORNEYS' FEES, COSTS, AND ENHANCEMENT AWARD

1 I, PAUL K. HAINES, declare as follows:

2 1. I am the principal of the law firm Haines Law Group, APC, and counsel for the named
3 Plaintiff Carlos Chacon (“Plaintiff”) in the above-captioned matter. I am a member in good standing of
4 the bar of the State of California and am admitted to practice in this Court. I have personal knowledge
5 of the facts stated in this declaration and could testify competently to them if called upon to do so.

6 2. I am a 2006 graduate of Pepperdine University School of Law, where I graduated cum
7 laude. During law school, I worked as a law clerk for the appellate firm of Horvitz & Levy, located in
8 Encino, California. I also spent a semester in law school working as an extern for the Honorable
9 Edward Rafeedie, District Judge for the United States District Court for the Central District of
10 California.

11 3. Since graduating from law school, my practice has focused exclusively on employment
12 litigation. In September 2007, I began working as an associate attorney at the international law firm
13 of Littler Mendelson P.C., at its Los Angeles office, which according to its website is the “largest U.S.-
14 based law firm exclusively devoted to representing management in every aspect of labor and
15 employment law.” While at Littler Mendelson, I was primarily staffed on wage and hour class actions
16 venued in both state and federal courts, and I also worked on a number of single and multi-plaintiff
17 wage and hour matters as well.

18 4. During my employment at Littler Mendelson, I played a significant role in the class
19 actions that I was staffed on, as I was often the only associate staffed on such cases. In particular, I
20 received a wide-array of wage and hour class action experience performing the following types of
21 tasks: drafting demurrers, motions to strike and/or dismiss; removing actions from state court to federal
22 court; drafting and responding to written discovery; drafting and opposing discovery related motions;
23 arguing discovery related motions; drafting motions to consolidate related matters; interviewing
24 putative class members and obtaining declarations in connection with class certification; drafting
25 oppositions to motions for class certification; drafting motions for decertification following class
26 certification; conducting exposure analyses to assess the strengths and weaknesses of asserted claims,
27 the likelihood of prevailing at class certification and potential damages resulting from such claims;

1 drafting mediation briefs; serving as the primary contact to in-house counsel; deposing named plaintiff
2 and putative class members; deposing retained expert witnesses; and defending the depositions of
3 corporate witnesses. In short, I played an integral role in all aspects of litigation from the inception of
4 a matter through and beyond class certification. I also supervised the work of several junior attorneys
5 who were staffed on the same wage and hour class actions.

6 5. In June 2011, I voluntarily resigned from Littler Mendelson in order to accept an
7 associate attorney position with the international law firm of Morgan, Lewis & Bockius LLP, at its Los
8 Angeles office, where I began working in July 2011. During my employment at Morgan, Lewis &
9 Bockius LLP, I worked exclusively on the defense of wage and hour class and collective actions. For
10 the vast majority of these cases, I was the only associate staffed on the matter, and I performed the
11 same job duties as described in the immediately preceding paragraph. In addition to working on wage
12 and hour class actions, at Morgan, Lewis & Bockius I also worked on a number of “hybrid” actions
13 asserting nationwide wage and hour claims under the Fair Labor Standards Act (“FLSA”), as well as
14 California-specific claims under Rule 23 of the Rules of Civil Procedure.

15 6. In July 2012, I transitioned into litigating wage and hour class actions from the
16 Plaintiff’s side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since February
17 2016, as a Shareholder of the Haines Law Group, APC. Currently, over ninety percent (90%) of my
18 practice is dedicated exclusively to the prosecution of wage and hour class actions, and I am currently
19 responsible for prosecuting over thirty (30) wage and hour class actions filed in both State and Federal
20 courts throughout California. Below are some of the matters in which I have been appointed as Class
21 Counsel, all of which have been granted final approval: *Hilberger v. Eisenhower Medical Center*, Case
22 No. INC1204915, California Superior Court, County of Riverside, Honorable Judge John G. Evans,
23 presiding, (in which I was approved for an hourly rate of \$500 for work performed in 2012 and 2013);
24 *Lopez v. Cornucopia Tools and Plastics, Inc.*, Case No. CV138049, California Superior Court, County
25 of San Luis Obispo, Honorable Judge Martin J. Tangeman, presiding, (in which I was approved for an
26 hourly rate of \$425 for work performed in 2013 and 2014); *Tacker v. Compass Health, Inc.*, Case No.
27 CV13-02261 BRO (JCG), United States District Court, Central District of California, Honorable Judge
28

1 Beverly Reid O’Connell, presiding, (in which I was approved for an hourly rate of \$500 for work
2 performed in 2013 and 2014); *Noell v. American Professional Ambulance Corporation, Inc.*, Case No.
3 BC499345, California Superior Court, County of Los Angeles, Honorable Judge Kenneth R. Freeman,
4 presiding, (in which I was approved for an hourly rate of \$500 for work performed in 2013 and 2014);
5 *Bautista v. Harvest Management Sub LLC*, Case No. CV12-10004 FMO (CWx), United States District
6 Court, Central District of California, Honorable Judge Fernando M. Olguin, presiding (in which I was
7 approved for an hourly rate of \$500 for work performed in 2012, 2013 and 2014); *Davila v. OCB*
8 *Restaurant Co.*, Case No. CV13-5403 PA (JCG), United States District Court, Central District of
9 California, Honorable Judge Percy Anderson, presiding (in which I was approved for an hourly rate of
10 \$500 for work performed in 2013 and 2014); *Abad v. Waste Connections, Inc.*, Case No. CV12-06708
11 DDP (PJWx), United States District Court, Central District of California, Honorable Judge Dean D.
12 Pregerson, presiding (in which I was approved for an hourly rate of \$500 for work performed in 2013
13 and 2014); *Plantillas v. Snap-On Incorporated*, Case No. CV13-05153 DDP (VBKx), United States
14 District Court, Central District of California, Honorable Judge Dean D. Pregerson, presiding (in which
15 I was approved for an hourly rate of \$500 for work performed in 2013 and 2014); *Theodore v. Keyes*
16 *European, LLC*, Case No. BC521395, California Superior Court, County of Los Angeles, Honorable
17 Judge Elihu Berle, presiding (in which I was approved for an hourly rate of \$500 for work performed
18 in 2013 and 2014); *Morales v. Sunset Tower Hotel LLC*, Case No. BC511924, California Superior
19 Court, County of Los Angeles, Honorable Judge John Shepard Wiley Jr., presiding (in which I was
20 approved for an hourly rate of \$500 for work performed in 2013 and 2014); *Gonzalez v. Universal*
21 *Alloy Corp.*, Case No. SACV13-00807 JVS (MRWx), United States District Court, Central District of
22 California, Honorable Judge James V. Selna, presiding (in which I was approved for an hourly rate of
23 \$500 for work performed in 2013 and 2014); *Morawski v. Milt Guggia Enterprises, Inc.*, Case No.
24 CV13-2349 ABC (RZx), United States District Court, Central District of California, Honorable Judge
25 Andre Birotte, Jr., presiding (in which I was approved for an hourly rate of \$500 for work performed
26 in 2013 and 2014); *Thorp v. Alcal Industries, Inc., et al.*, Case No. CV13-02289 YGR, United States
27 District Court, Northern District of California, Honorable Judge Yvonne Gonzalez Rogers, presiding
28

(in which I was approved for an hourly rate of \$500 for work performed in 2013 and 2014); *Myles v. College Hospital*, Case No. BC487206, California Superior Court, County of Los Angeles, Honorable Judge John Shepard Wiley, Jr., presiding (in which I was approved for an hourly rate of \$500 for work performed in 2013, 2014 and 2015); *Sarinana v. DS Waters of America, Inc.*, Case No. C13-0905 EMC, United States District Court, Northern District of California, Honorable Edward M. Chen, presiding (in which I was approved for an hourly rate of \$550 for work performed in 2014 and 2015); *Julio v. Anthony, Inc.*, Case No. CV14-03172 AB (SHx), United States District Court, Central District of California, Honorable Judge Andre Birotte Jr., presiding (in which I was approved for an hourly rate of \$550 for work performed in 2014 and 2015); *Litt v. Western Stone & Metal Corp.*, Case No. 3:14-cv-02804-PJH, United States District Court, Northern District of California, Honorable Judge Phyllis J. Hamilton, presiding (in which I was approved for an hourly rate of \$550 for work performed in 2014 and 2015); *Rubalcava v. United Towing and Transport Burbank, et al.*, Case No. BC518468, California Superior Court, County of Los Angeles, Honorable Judge Kenneth Freeman, presiding (in which I was approved for an hourly rate of \$550 for work performed in 2013, 2014 and 2015); *Sanchez v. Res-Care, Inc.*, Case No. BC526175, California Superior Court, County of Los Angeles, Honorable John S. Wiley, presiding (in which I was approved for an hourly rate of \$550 for work performed in 2013, 2014 and 2015); *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States District Court, Central District of California, Honorable Judge John F. Walter, presiding (in which I was approved for an hourly rate of \$550 for work performed in 2014 and 2015); *Rivera Regalado v. Jaguar Farm Labor Contracting*, Case No. CV 130569, California Superior Court, County of San Luis Obispo, Honorable Martin J. Tangeman, presiding (in which I was approved for an hourly rate of \$550 for work performed in 2014 and 2015); *Rodas v. Gateways Hospital and Mental Health Center*, Case No. BC503179, California Superior Court, County of Los Angeles, Honorable Judge Amy D. Hogue, presiding (in which I was approved for an hourly rate of \$550 for work performed in 2014 and 2015); *Escobar v. Century West, LLC*, Case No BC564873, California Superior Court, County of Los Angeles, Honorable Judge Jane L. Johnson, presiding (in which I was approved for an hourly rate of \$550 for work performed in 2014 and 2015 and 2016); *Shaw v. Conant Auto Retail, San*

1 *Diego*, Case No. 37-2014-00044052-CU-OE-CTL, California Superior Court, County of San Diego,
2 Honorable Judge Joan M. Lewis, presiding (approving an hourly rate of \$575 for work performed in
3 2014, 2015, and 2016); *Tirado v. Ricon Corp.*, Case No. BC537042, California Superior Court, County
4 of Los Angeles, Honorable John S. Wiley, presiding (approving an hourly rate of \$575 for work
5 performed in 2014, 2015, and 2016); and *Horta v. Searles Valley Minerals, Inc.*, Case No. CIVDS
6 1507615, California Superior Court, County of San Bernardino, Honorable Donald Alvarez presiding
7 (approving an hourly rate of \$575 for work performed in 2015 and 2016); *Cristobal v. Koos*
8 *Manufacturing, Inc.*, Case No. BC591484, California Superior Court, County of Los Angeles, Hon.
9 William F. Highberger presiding (approving an hourly rate of \$575 for work performed in 2015 and
10 2016); *Rodriguez v. Spartan, Inc.*, Case No. BCV-15-100007-DRL, California Superior Court, County
11 of Kern, Honorable David R. Lampe presiding (approving hourly rate of \$575 for work performed in
12 2015, 2016, and 2017); *Kostyuk, et al. v. Golden State Overnight Delivery Service, Inc.*, Case No.
13 RG14727191, California Superior Court, Alameda County, Honorable Winifred Y. Smith presiding
14 (approving an hourly rate of \$575 for work performed in 2015, 2016, and 2017); *Nunez v. CompuCom*
15 *Systems, Inc.*, Case No. BC618385, California Superior Court, County of Los Angeles, Honorable
16 Judge John Shepard Wiley, Jr., presiding (approved at an hourly rate of \$600 for work performed in
17 2016 and 2017); *Mansilla v. Haeco Americas Line Services, LLC, et al*, Case No. BC615310, Superior
18 Court of California, County of Los Angeles, Honorable Judge Elihu M. Berle presiding (approved at
19 an hourly rate of \$600 for work performed in 2016 and 2017); *Morales v. Caremeridian, LLC, et al.*,
20 Case No. BC593191, California Superior Court, County of Los Angeles, Judge William F. Highberger
21 presiding (granting final approval of settlement on behalf of direct support professionals involving
22 claims for unpaid wages, meal and rest period violations, wage statement violations, and other claims).

23 7. I have also moved to certify and have received an order certifying a class action and/or
24 conditionally certifying a collective action, in the following cases:

- 25 • *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-CXC,
26 California Superior Court, County of Orange, Honorable Judge Gail A. Andler, presiding
27 (certifying a class of employees who were misclassified as independent contractors);

- 1 • *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United States
2 District Court, Central District of California, Honorable Judge Beverly Reid O’Connell,
3 presiding (conditionally certifying an unpaid FLSA overtime wage class);
- 4 • *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States District
5 Court, Central District of California, Honorable Judge John F. Walter, presiding (certifying a
6 rest period violation class and conditionally certifying an FLSA unpaid overtime wage class);
- 7 • *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court, Northern
8 District of California, Honorable Judge Haywood S. Gilliam, Jr., presiding (conditionally
9 certifying an unpaid FLSA overtime wage class);
- 10 • *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States
11 District Court, Eastern District of California, Honorable Jennifer L. Thurston, presiding
12 (conditionally certifying an unpaid FLSA overtime wage class);
- 13 • *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC,
14 California Superior Court, County of Orange, Honorable Judge William Claster, presiding
15 (certifying unpaid overtime wage class and waiting time penalty class); and
- 16 • *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United States
17 District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six
18 classes of employees for rest period violations, wage statement violations, meal period
19 violations, and overtime and double-time violations);
- 20 • *Vazquez, et al v. Kraft Heinz Foods Company*, Case No. 16-cv-2749-WQH-BLM, United States
21 District Court, Southern District of California, Honorable William Q. Hayes presiding
22 (certifying six classes of employees for unpaid wages, meal period violations, wage statement
23 violations, and waiting time penalties); and
- 24 • *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA,
25 United States District Court, Northern District of California, Honorable William H. Alsup
26 presiding (certifying three classes of employees for unlawful wage deduction violations, wage
27 statement violations, and waiting time violations).

1 8. In 2015, 2016 and 2017, Thomson Reuters and Los Angeles Magazine recognized me
2 as a Top Young Attorney in Southern California in the annual Rising Star Edition of Super Lawyer.
3 This is an honor awarded to no more than two and a half percent of attorneys under the age of forty in
4 Southern California each year. In 2018 and 2019 Thomson Reuters recognized me as a “Super
5 Lawyer” in the annual Super Lawyer magazine, an honor awarded to no more than five percent of all
6 attorneys in Southern California each year.

7 9. As co-lead counsel for Plaintiff, I have been intimately involved in every aspect of this
8 case from its inception through the present, and I believe that the proposed Settlement is a reasonable
9 result for the Aggrieved Employees.

10 10. The details of the work completed by my firm and/or my co-counsel are set forth in
11 the declaration of Scott M. Lidman filed concurrently herewith.

12 11. Since undertaking representation of Plaintiff, my firm has borne the costs of litigation
13 for nearly two years without receiving any compensation to date. To date, my firm has incurred
14 \$20,553.31 in out-of-pocket costs reasonably incurred in litigating this matter, which includes costs of
15 \$60.00 for filing fees associated with this motion. Attached hereto as **Exhibit 1** is an Expense
16 Summary reflecting these costs, which include but are not limited to: filing fees, attorney service fees,
17 court reporter fees, deposition transcripts, messenger fees, service fees, copying costs, mediation fees,
18 postage, and travel expenses incurred for out-of-state depositions. The itemized costs are also
19 identified in **Exhibit 2** attached hereto.

20 12. Attached hereto as **Exhibit 2** is a true and correct copy of a report all attorney time
21 billed to this matter by my firm since undertaking this case in August 2020. The report is partially
22 redacted to protect attorney-client communications and attorney work product. The lodestar for my
23 firm is \$6,955.00. A general summary showing the number of hours of work performed by me.

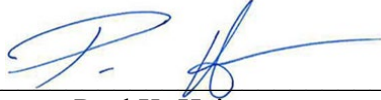
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Name	Billing Initials	Rate	Hours	Pre-Multiplier Lodestar
Paul K. Haines (14th Year Attorney)	PKH	\$650	10.70	\$6,955.00
Total Lodestar				\$6,955.00

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct. Executed on August 2, 2021, at El Segundo, California.



 Paul K. Haines

EXHIBIT 1

EXHIBIT 1

Expense Summary
Carlos Chacon v. Exemplis LLC

EXPENSE	AMOUNT
Mediation Costs (Plaintiff's portion of mediator's expenses)	\$5,000.00
Expert Fees	\$13,637.00
Filing, Service, and Messenger Fees	\$1,644.28
Copying Costs	\$53.25
Postage Costs	\$93.88
Legal Research Fees	\$30.90
CourtCall Expenses	\$94.00
PAGA Approval Motion Fees	\$60.00
TOTAL:	\$20,613.31

EXHIBIT 2

EXHIBIT 2

August 2, 2021

Carlos Chacon

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
6/10/2020	PKH	Telephone call with Burgis [REDACTED]	0.40 650.00/hr	260.00
	PKH	Confer with S. Lidman [REDACTED]	0.40 650.00/hr	260.00
6/22/2020	PKH	Confer with E. Nguyen and S. Lidman re: legal research [REDACTED]	0.30 650.00/hr	195.00
	PKH	Review PAGA letter to LWDA.	0.30 650.00/hr	195.00
	PKH	Review draft PAGA only complaint after conferring with S. Lidman.	0.60 650.00/hr	390.00
6/23/2020	PKH	Receive and review letter of representation from R. Wulffson of Carothers DiSante & Freudenberger LLP.	0.20 650.00/hr	130.00
	PKH	Confer with E. Nguyen and S. Lidman re: case strategy.	0.50 650.00/hr	325.00
11/16/2020	PKH	Confer with S. Lidman re: status of case and potential for mediation.	0.40 650.00/hr	260.00
2/12/2021	PKH	Communicate with S. Lidman re: mediation preparation.	0.40 650.00/hr	260.00
4/1/2021	PKH	Communicate with S. Lidman and E. Nguyen data produced for mediation.	0.30 650.00/hr	195.00
4/16/2021	PKH	Communicate with S. Lidman re: status of analysis in advance of mediation.	0.50 650.00/hr	325.00

8/2/2021

			<u>Hrs/Rate</u>	<u>Amount</u>
4/26/2021	PKH	Confer with E. Nguyen and S. Lidman [REDACTED] [REDACTED]	0.40 650.00/hr	260.00
4/29/2021	PKH	Confer with S. Lidman re: potential exposure analysis and strategy for mediation negotiations.	0.50 650.00/hr	325.00
	PKH	Confer with S. Lidman re: strategy for mediation including exposure analysis.	0.50 650.00/hr	325.00
	PKH	Review supplement to mediation brief with exposure analysis.	0.50 650.00/hr	325.00
5/4/2021	PKH	Confer with S. Lidman re: settlement and plan for approval process including the drafting of the settlement agreement.	0.40 650.00/hr	260.00
5/18/2021	PKH	Confer with E. Nguyen S. Lidman and re: L. David's proposed changes to the settlement agreement.	0.30 650.00/hr	195.00
6/1/2021	PKH	Confer with S. Lidman and E. Nguyen re: PAGA approval motions and court's required supporting documents.	0.30 650.00/hr	195.00
	PKH	Communicate with S. Lidman re: status of settlement agreement and PAGA approval documents.	0.40 650.00/hr	260.00
7/12/2021	PKH	Review and approve finalized settlement agreement before the Parties executed.	0.50 650.00/hr	325.00
7/19/2021	PKH	Confer with S. Lidman re: status of settlement agreement.	0.20 650.00/hr	130.00
7/21/2021	PKH	Confer with S. Lidman re: court's tentative rulings for PAGA approval motions.	0.50 650.00/hr	325.00
7/27/2021	PKH	Receive and revise my declaration in support of PAGA approval motion.	0.40 650.00/hr	260.00
	PKH	Review draft PAGA approval motion and supporting documents to ensure complies with court's prior tentative rulings.	1.50 650.00/hr	975.00
For professional services rendered			10.70	\$6,955.00

Additional Charges :

			<u>Qty/Price</u>	
6/30/2020	PKH	Postage for June, 2020.	1 27.90	27.90

8/2/2021

			<u>Qty/Price</u>	<u>Amount</u>
6/30/2020	PKH	Copying cost for June, 2020.	15 0.25	3.75
8/14/2020	PKH	Filing fee for LWDA	1 75.00	75.00
8/27/2020	PKH	One Legal's fee for filing of Summons Issued and Filed	1 12.20	12.20
	PKH	One Legal's fee for filing of new case, Summons and Complaint and Jury Fees	1 1,494.56	1,494.56
8/28/2020	PKH	One Legal's fee for filing of Peremptory Challenge Pursuant to 170.6 CCP	1 12.20	12.20
11/30/2020	PKH	Postage for November, 2020.	1 2.60	2.60
	PKH	Copying cost for November, 2020.	48 0.25	12.00
1/6/2021	PKH	CourtCall fee for hearing on 6/3/2021.	1 94.00	94.00
1/13/2021	PKH	One Legal's fee for filing of CMS	1 13.00	13.00
4/21/2021	PKH	Frank Feder mediation fee - 5/3/21 mediation	1 5,000.00	5,000.00
4/30/2021	PKH	Copying cost for April, 2021.	146 0.25	36.50
	PKH	FedEx cost for April 2021	1 63.38	63.38
	PKH	Economists Inc. expert fee - Invoice #28941	1 13,637.00	13,637.00
	PKH	Copying cost for April, 2021.	1 0.25	0.25
5/19/2021	PKH	One Legal's fee for filing of Stip and Order	1 37.32	37.32
5/31/2021	PKH	Westlaw cost for May, 2021.	1 30.90	30.90
	PKH	Copying cost for May, 2021.	3 0.25	0.75

	<u>Amount</u>
Total additional charges	\$20,553.31
Total amount of this bill	\$27,508.31
Balance due	\$27,508.31