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8 KRYSTAL THOMAS
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN BERNARDINO**
11 **(UNLIMITED JURISDICTION)**

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

16 *Plaintiff(s),*

17 vs.

18 CHOICE PHYSICIANS NETWORK, INC., a
19 California corporation; DESERT
PHYSICIANS MANAGEMENT, LLC, a
20 California corporation, and DOES 1 through
21 50, inclusive,

22 *Defendant(s).*
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Case No.: CIVDS2013964

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
KRYSTAL THOMAS’S MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Action filed: 06/25/2020

Hearing Date: October 20, 2021
Hearing Time: 10:00 a.m.
Dept.: S-26, Hon. David Cohn



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1 **DECLARATION OF WALTER L. HAINES IN SUPPORT OF PLAINTIFF KRYSTAL**
2 **THOMAS’S MOTION FOR APPROVAL OF PAGA SETTLEMENT**

3 I, Walter L. Haines, declare:

4 1. I am counsel of record for Plaintiff Krystal Thomas (hereafter referred to as
5 “Plaintiff” or “Thomas”) in this action against Defendants Choice Physicians Network, Inc., and
6 Desert Physicians Management, LLC (collectively “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 Approval of PAGA Settlement. I make this Declaration based on my personal knowledge and
9 if called to testify I could and would competently testify to the matters contained in this
10 Declaration.

11 2. I am highly experienced in class and representative action litigation specializing
12 in actions of this nature. I have been practicing law for over 40 years and I am highly experienced
13 in actions of this nature. I am the most senior attorney in my firm, United Employees Law Group,
14 and worked on the litigation of this matter. I formed United Employees Law Group in 2005,
15 primarily to represent employees in their wage claims. I have represented over 1,500 clients in
16 wage and hour disputes of which more than 300 cases were class actions with settlements totaling
17 over \$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 Plaintiff or with the PAGA Members. I am
21 not related to any representative Plaintiff. I have not previously represented Defendant in any
22 matter. I do not represent opposing factions within the PAGA Members in that all claims are
23 predicated upon the same theories of liability and benefit all PAGA Members equally. In sum, I
24 am well-suited to act as Plaintiff’s counsel and will continue to vigorously represent the interests
25 of the PAGA Members.

26 4. United Employees Law Group has prosecuted this litigation solely on a
27 contingent-fee basis, and has been completely at risk that it would not receive any compensation
28 for prosecuting claims against the Defendant.

 5. United Employees Law Group has participated in this litigation and has performed
work on behalf of Plaintiff since the inception of this litigation. The hours submitted with this
declaration are solely for work performed on behalf of the PAGA Members alleged in the above-



entitled California action and not any other state or federal matter.

6. I performed, among other things, the following tasks related to this matter: analyzed initial clients' claims; performed initial investigation inclusive of research necessary for case evaluation and searched court records relative to possible competing cases. I reviewed all settlement papers along with orders from the court and assisted with client liaison and other tasks assigned by lead counsel.

7. The hourly rate for my time is \$675 per hour which is my usual and customary hourly rate charged for my services in similar complex class and representative actions.

8. The total number of hours spent by me on this litigation is 12.30 hours through September 10, 2021.

9. My total lodestar amount through September 10, 2021 is \$8,302.50.

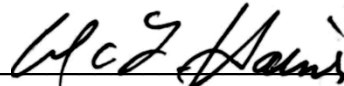
10. No charges have been included for paralegal or staff time spent on this matter.

11. Out of pocket expenses for court fees are \$3.30. My out of pocket expenses for postage are \$4.00. Total out of pocket expenses are \$7.30.

12. I believe that the Settlement is fair, adequate, and reasonable. The Settlement provides substantial monetary benefits to the PAGA Members and is a product of diligent efforts of Plaintiff's Counsel to obtain the best possible result for the PAGA Members. This Settlement was reached following thorough legal and factual research and analysis, thorough review of extensive data relative to the claims in the action, arduous settlement negotiations, and thorough investigation of the underlying facts by the respective parties and review of records. The settlement negotiations were, at all times, adversarial and non-collusive in nature. The proposed Settlement is within the range of reasonableness, and the PAGA Members have supported the Settlement.

I declare under penalty of perjury under the laws of the United States and California that the foregoing is true and correct.

Executed on Friday, September 10, 2021 at Los Angeles, California.


WALTER L. HAINES,



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