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13 Attorneys for Plaintiff,

14 PAULA JOHNSON, and all others similarly situated

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **FOR THE COUNTY OF SAN FRANCISCO**

17 **(UNLIMITED JURISDICTION)**

18 PAULA JOHNSON, on behalf of herself, all  
19 others similarly situated, the general public, and  
20 as an “aggrieved employee” on behalf of other  
21 “aggrieved employees” under the Labor Code  
Private Attorneys General Act of 2004,

22 *Plaintiff(s),*

23 vs.

24 NAN MCKAY & ASSOCIATES, INC., a  
25 California corporation; and DOES 1–50,  
26 inclusive,

27 *Defendant(s).*

Case No. CGC-20-586796

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

Hearing Date: February 27, 2023

Hearing Time: 9:30 a.m.

Hearing Dept.: 302

Action filed: September 24, 2020



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I, WALTER L. HAINES, declare as follows:

2. I am a highly experienced class action counsel specializing in actions of this nature. I have been practicing law for over 40 years and I am highly experienced in actions of this nature. I am the most senior attorney at my firm, United Employees Law Group, and worked on the litigation of this matter. I formed United Employees Law Group in 2005, primarily to represent employees in their wage claims. I have represented over 1,500 clients in wage and hour disputes of which more than 300 cases were class actions with settlements totaling over \$400,000,000. These class action cases include Fortune 500 companies such as Pepsi, Intel, Home Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co., Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

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

es, California.

  
\_\_\_\_\_  
WALTER L. HAINES,  
Declarant

