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Attorneys for Plaintiff VERONICA FERRUFINO,
on behalf of herself and all others similarly situated

Additional Plaintiffs' Counsel on Next Page

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

VERONICA FERRUFINO, on behalf of
herself and all others similarly situated,

Plaintiffs,

v.

FAMILY HEALTHCARE NETWORK, a
California corporation; and DOES 1 to 100,
inclusive,

Defendants.

CLASS ACTION

Case No.: VCU283726

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND AWARD FOR
ATTORNEY FEES, COSTS AND CLASS
REPRESENTATIVE ENHANCEMENTS**

Final Approval Hearing:

Date: October 24, 2022

Time: 8:30 a.m.

Dept: 7

Honorable Bret D. Hillman
Department 7

Action filed: July 29, 2020
Trial Date: None Set

Consolidated (on October 26, 2020) with:

ANTONIO MUNOZ, individually, and on
behalf of other members of the general
public similarly situated;

Plaintiff,

v.

CLASS ACTION

Lead Case No.: VCU282194

Honorable Bret D. Hillman
Department 7

**DECLARATION OF WALTER L. HAINES IN SUPPORT OF FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND AWARD FOR ATTORNEY FEES, COSTS AND
CLASS REPRESENTATIVE ENHANCEMENTS**

1 FAMILY HEALTHCARE NETWORK, a)
2 California corporation; and DOES 1 to 100,)
3 inclusive,)
4 Defendants.)

Action filed: February 24, 2020
Trial Date: None Set

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6 *Additional Counsel for Plaintiffs:*

7 Edwin Aiwazian, Esq. (#232943)
8 Joanna Ghosh, Esq. (#272479)
9 LAWYERS FOR JUSTICE, PC.
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Glendale, CA 91203
Tel.: (818) 265-1020 / Fax: (818) 265-1021
Email: Edwin@calljustice.com

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11 Attorneys for Plaintiff ANTONIO MUNOZ,
on behalf of herself and all others similarly situated

DECLARATION OF KEVIN T. BARNES

I, WALTER L. HAINES, declare:

1. I am an attorney duly licensed to practice law in the State of California and am the principal attorney at United Employees Law Group, PC, and am Co-counsel for the class action Plaintiffs Veronica Ferrufino and Antonio Munoz. I have personal knowledge of the matters set forth herein, and would and could testify thereto if called as a witness herein.

2. I am a highly experienced class action counsel specializing in 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.

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

4. United Employees Law Group has participated in this litigation and has performed work on behalf of Plaintiffs since the inception of this litigation. The hours submitted with this declaration are solely for work performed on behalf of the class alleged in the above-entitled California action and not any other state or federal matter.

5. 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 consulted with co-counsel as to issues relating to the prosecution of this case, reviewed all settlement papers along with orders from the court, law and motion papers and assisted with client liaison

1 and other tasks assigned by lead counsel.

2 6. The hourly rate for my time is \$725.00 per hour which is my usual and
3 customary hourly rate charged for my services in similar complex class actions.

4 7. My total lodestar amount through September 23, 2022 is approximately
5 \$17,617.50. Collectively, Plaintiffs' counsel will have a total of approximately 24.30 hours and
6 a lodestar of approximately \$17,617.50. Attached as **Exhibit 1** to this declaration is Plaintiffs'
7 counsel's estimated Itemization of Hours of United Employees Law Group, PC to date.

8 8. My involvement with the case was primarily in the very initial stages of vetting
9 the potential client, along with verification that there were no conflicting cases existing at that
10 time. During most of the litigation there were ongoing communications with co-counsel
11 discussing strategy and status of litigation.

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

13 10. My out of pocket expenses for postage are \$4.00. Total out of pocket expenses
14 are \$4.00. Attached as **Exhibit 2** to this declaration is my firm's, Unite Employees Law Group,
15 PC, estimated Itemization of Costs to date.

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

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1 I declare under the penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed this 23rd day of September, 2022, at Los Angeles, California.

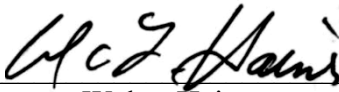
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EXHIBIT “1”

Veronica Ferrufino vs. Family Healthcare Network

Date	Code	Description	Hrs	Rate	Amt
4/26/2020	Rvw	Review Intake and Discussions with Staff re client signup	3.2	\$725.00	\$2,320.00
5/3/2020	BW	Certified 1st Ltr to Co.	0.3	\$725.00	\$217.50
5/22/2020	Rvw	Received/review Personnel file	0.3	\$725.00	\$217.50
7/8/2020	Rvw	SF Intake	0.2	\$725.00	\$145.00
7/8/2020	Rvw	Fully Executed Fee Split Agrmt	0.2	\$725.00	\$145.00
7/8/2020	Rvw	Fully Executed Retainer	0.2	\$725.00	\$145.00
7/8/2020	Rvw	Docs re Accomodations, Intent to Transfer	0.3	\$725.00	\$217.50
7/8/2020	Rvw	PS rcvd from Client	0.2	\$725.00	\$145.00
7/14/2020	Rvw	Potential competing case research	3.5	\$725.00	\$2,537.50
7/28/2020	Rvw	Lead Counsel Contact Information	0.2	\$725.00	\$145.00
7/21/2020	Rvw	Letter to LWDA	0.5	\$725.00	\$362.50
7/8/2020	Rvw	Email re Complaint	0.2	\$725.00	\$145.00
8/17/2020	Rvw	Pltf's Rqsts for Prod of Docs, Set No. 1	0.2	\$725.00	\$145.00
8/17/2020	Rvw	Pltf's Special Interrogatories, Set No. 1	0.2	\$725.00	\$145.00
8/18/2020	Rvw	Answer to Complaint	0.3	\$725.00	\$217.50
9/25/2020	Rvw	Defe's Ntce of Mtn and Mtn to Consolidate Cases	0.2	\$725.00	\$145.00
9/25/2020	Rvw	Defe's Memo of Points and Auth ISO Mtn to Consolidate Cases	0.2	\$725.00	\$145.00
9/25/2020	Rvw	Decl of Sara Woods ISO Mtn to Consolidate Cases	0.2	\$725.00	\$145.00
9/25/2020	Rvw	Proposed Order Granting Defe's Mtn to Consolidate Cases	0.2	\$725.00	\$145.00
10/16/2020	Rvw	Defe's Reply to P's Oppstn to Mtn to Consolidate	0.2	\$725.00	\$145.00
10/21/2020	Rvw	Resp to Rqsts for Prod of Docs, Set One	0.2	\$725.00	\$145.00
10/21/2020	Rvw	Resp to Special Interrogatories, Set One	0.2	\$725.00	\$145.00
11/5/2020	Rvw	P's Rqsts for Prod of Docs, Set No. w to FHN	0.2	\$725.00	\$145.00
11/5/2020	Rvw	P's Special Interroga Propounded on FHC, Set No. 2	0.2	\$725.00	\$145.00
11/5/2020	Rvw	P's Ntce of Taking Depstns of Defe's Most Qualified and Rqst for Prod of Docs	0.2	\$725.00	\$145.00
11/5/2020	Rvw	Email from Co-Counsel re Fee sharing agreement	0.2	\$725.00	\$145.00
11/20/2020	Rvw	Proposed Order re Stipul re Filing of First Amended Complaint	0.2	\$725.00	\$145.00
11/20/2020	Rvw	Proposed Order re Stipul re Status Conference	0.2	\$725.00	\$145.00
11/20/2020	Rvw	Stipul re Filing of First Amended Complaint	0.2	\$725.00	\$145.00
11/20/2020	Rvw	POS	0.2	\$725.00	\$145.00
11/20/2020	Rvw	Proposed Order re Stipul re Filing of 1st Amended Complaint	0.2	\$725.00	\$145.00
11/20/2020	Rvw	First Amended Complaint	0.3	\$725.00	\$217.50
11/23/2020	Rvw	Joint Case Mgmt Conference Statement and Stipul	0.2	\$725.00	\$145.00
11/24/202	Rvw	Email from Co-counsel re rvw of fee sharing agreement	0.2	\$725.00	\$145.00
11/24/2020	Rvw	FAMILYH - 2020-11 - Consent to Agreement Division Attorneys' Fees and Costs (VF KB WH Sigs)	0.4	\$725.00	\$290.00
11/24/2020	Rvw	2020-11-17-Joint Prosection Agreement (KB WH Sigs)	0.2	\$725.00	\$145.00
11/25/2020	Rvw	Stipul re Filing of First Amended Complaint	0.2	\$725.00	\$145.00
11/25/2020	Rvw	POS	0.2	\$725.00	\$145.00
11/25/2020	Rvw	Proposed First Amended Complaint	0.3	\$725.00	\$217.50
11/25/2020	Rvw	POS	0.2	\$725.00	\$145.00
2/25/2021	Rvw	Joint CMC Stmt and Stipul	0.2	\$725.00	\$145.00
3/9/2021	Rvw	FAMILYH - 2021- Amended Consent to Fee Sharing Agreement	0.2	\$725.00	\$145.00
3/9/2021	Rvw	Email from Co-counsel re rvw of revised Fee sharing Agreement	0.2	\$725.00	\$145.00
3/10/2021	Rvw	FAMILYH - 2021- Amended Consent to Fee Sharing Agreement - WH Sig	0.2	\$725.00	\$145.00

Veronica Ferrufino vs. Family Healthcare Network

4/28/2021	Rvw	Joint Stip and Order Granting P's Leave to File 1st Amended Consolidated Class Action Complaint	0.3	\$725.00	\$217.50
6/10/2021	Rvw	2021.06.10_Consolidated CX_Family Healthcare Network	0.2	\$725.00	\$145.00
6/10/2021	Rvw	1st Amended Consolidated Amended Class Action Complaint	0.2	\$725.00	\$145.00
7/9/2021	Rvw	Joint CMC Statement and Stipul	0.2	\$725.00	\$145.00
7/9/2021	Rvw	2021.07.09_Joint CMC Statement & Stip	0.2	\$725.00	\$145.00
7/16/2021	Rvw	Joint Stipul to Continue Trial Date and Related Deadlines	0.2	\$725.00	\$145.00
7/30/2021	Rvw	POS	0.2	\$725.00	\$145.00
7/30/2021	Rvw	POS	0.2	\$725.00	\$145.00
7/30/2021	Rvw	Amended POS	0.2	\$725.00	\$145.00
7/30/2021	Rvw	P Munoz's Ntce of Mtn and Mtn to Compel Defe to Provide Further Resp to P's Rqst for Prod, Set 1	0.3	\$725.00	\$217.50
7/30/2021	Rvw	Proposed Order	0.2	\$725.00	\$145.00
7/30/2021	Rvw	Decl of Kramer ISO P's Mtn to Compel Defe to Provide Further Reso to P's Rqst for Production	0.2	\$725.00	\$145.00
7/30/2021	Rvw	Decl of Kramer ISO P's Mtn to Compel Defe to Provide Further Reso to P's Special Inttero, Set One	0.2	\$725.00	\$145.00
7/30/2021	Rvw	Rule 3.1345 Separate Stmt ISO P's Ntce of Mtn and Mtn to Comopel Defe to Provide FR, Set One	0.2	\$725.00	\$145.00
7/30/2021	Rvw	Proposed Order	0.2	\$725.00	\$145.00
7/30/2021	Rvw	P's Ntce of Mtn to and Mtn to Compel Defe to Provide Further Reso to P's Special Intter, Set One	0.3	\$725.00	\$217.50
7/30/2021	Rvw	Rule 3.1345 Separate Stmt ISO P's Ntce of Mtn and Mtn to Compel Defe to Provide Further Resp	0.2	\$725.00	\$145.00
7/30/2021	Rvw	Proposed Order Granting P's Mtn to Compel Defe to Provide Further Resp to P's Form Interro, General, Set1	0.2	\$725.00	\$145.00
7/30/2021	Rvw	P's Ntce of Mtn and Mtn to Compel Defe's to Provide Further Resp to P's Form Interro, Set One	0.2	\$725.00	\$145.00
7/30/2021	Rvw	Decl of Kramer ISO P's Mtn to Compel Defe to Provide Further Resp to P's Form Interro, Set One	0.2	\$725.00	\$145.00
7/30/2021	Rvw	Decl of Kramer ISO P's Mtn to Compel Defe to Provide Further Resp to P's Special Interrogatories Set Two	0.2	\$725.00	\$145.00
7/30/2021	Rvw	Proposed Order Granting P's Mtn to Compel Defe to Provide Further Resp to P's Special Inttero, Set Two	0.2	\$725.00	\$145.00
7/30/2021	Rvw	P'sNtce of Mtn and Mtn to Compel Defe to Provide Further Resp to P's Special Intter, Set Two	0.3	\$725.00	\$217.50
7/30/2021	Rvw	Rule 3.1345 Separate Statement ISO P's Ntce of Mtn and Mtn to Compel Defe to Provide FR, Set Two	0.2	\$725.00	\$145.00
7/30/2021	Rvw	Rule 3.1345 Separate Statement ISO P's Ntce of Mtn and Mtn to Compel Defe to Provide Further Resp	0.2	\$725.00	\$145.00
8/24/2021	Rvw	2021.08.23_POS_Reply	0.2	\$725.00	\$145.00
8/24/2021	Rvw	2021.08.23_Reply ISO MTC RFP1_FHN	0.2	\$725.00	\$145.00
8/24/2021	Rvw	2021.08.23_Ntc of Taking MTC FRG1 Off Calendar_FHN	0.2	\$725.00	\$145.00
8/24/2021	Rvw	2021.08.23_Ntc of Taking MTC SRG2 Off Calendar_FHN	0.2	\$725.00	\$145.00
8/24/2021	Rvw	2021.08.23_Ntc of Taking MTC SRG1 Off Calendar_FHN	0.2	\$725.00	\$145.00
8/27/2021	Rvw	P's Ntce of Taking P's Mtn to Compel Defe to Provide Further Resp to P's Rqst for Prod (Set1)	0.2	\$725.00	\$145.00
8/27/2021	Rvw	2021.08.27_Ntc of Taking MTC RFP1 Off Calendar	0.2	\$725.00	\$145.00
12/22/2021	Rvw	Email from Co-Counsel re Declaration	0.2	\$725.00	\$145.00
12/22/2021	BW	FAMILY HEALTH - Decl. of WH (Signed)	1.0	\$725.00	\$725.00
12/22/2021	Rvw	3. FAMILY HEALTH - Decl. of KTB -comments.doc	0.3	\$725.00	\$217.50

Veronica Ferrufino vs. Family Healthcare Network

2/2/2022	Rvw	1. FAMILY HEALTH - 2022-02-28 - Second Suppl Decl of KTB ISO PA	0.3	\$725.00	\$217.50
2/2/2022	Rvw	Email from Co-counsel re Supplemental Declaration	0.2	\$725.00	\$145.00
2/11/2022	BW	Supplemental Declaration	1.2	\$725.00	\$870.00
2/18/2022	Rvw	Supplemental Declaration of Kevin T. Barnes	0.2	\$725.00	\$870.00
2/18/2022	Rvw	Supplemental Declaration of Edwin Aiwazin	0.2	\$725.00	\$870.00
2/22/2002	Rvw	Supplemental Declaration of Kevin T. Barnes	0.2	\$725.00	\$870.00
3/7/2022	Rvw	Minute Order	0.3	\$725.00	\$870.00
9/23/2022	Rvw	Declaration of WH ISO FA	1.0	\$725.00	\$870.00
		Total hours	24.3	\$725.00	\$17,617.50

EXHIBIT “2”

Veronica Ferrufino vs. Family Healthcare Network

Date	Code	Description	QTY	Rate	Amt
7/28/2020	POST	Certified 1st Ltr to Co.	1.00	\$4.00	\$4.00
		Total costs			\$4.00