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7 Attorneys for Plaintiff,

8 CHRIS MARCUS CALKINS, and all others similarly situated

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES**

11 **(UNLIMITED JURISDICTION)**

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

16 *Plaintiff(s),*

17  
18 vs.

19 UNITED SECURITY SERVICES, INC., an  
20 Illinois corporation; and DOES 1–50, inclusive,

21 *Defendant(s).*

Case No. 20STCV35391

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

Hearing Date: December 9, 2024  
Hearing Time: 10:00 a.m.  
Hearing Dept.: SSC-7, The Honorable  
Lawrence P. Riff

Action filed: September 16, 2020



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**ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)**

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1                                   **DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR**  
2                                   **PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

3 I, WALTER L. HAINES, declare as follows:

4           1.       I am an attorney duly licensed to practice law in the State of California and am an  
5 attorney of record for Plaintiff Chris Marcus Calkins née Carissa Calkins (“Plaintiff”) in his  
6 lawsuit against Defendant United Security Services, Inc. (“Defendant”). 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 Preliminary Approval of Class Action Settlement. I make this Declaration based on my  
9 personal knowledge and if called to testify I could and would competently testify to the matters  
10 contained in this Declaration.

11           2.       I am a highly experienced class action counsel specializing in actions of this  
12 nature. I have been practicing law for over 40 years and I am highly experienced in actions of this  
13 nature. I am the most senior attorney at my firm, United Employees Law Group, and worked on  
14 the litigation of this matter. I formed United Employees Law Group in 2005, primarily to  
15 represent employees in their wage claims. I have represented over 1,500 clients in wage and hour  
16 disputes of which more than 300 cases were class actions with settlements totaling over  
17 \$400,000,000. These class action cases include Fortune 500 companies such as Pepsi, Intel, Home  
18 Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co., Yahoo!,  
19 WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

20           3.       I have no conflicts of interest with the class or with the Class Representative. I am  
21 not related to the representative plaintiff. I have not previously represented Defendant in any  
22 matter. I do not represent opposing factions within the class in that all claims are predicated upon  
23 the same theories of liability and benefit all class members equally. In sum, I am well-suited to  
24 act as Class Counsel and will continue to vigorously represent the interests of the class.

25           4.       I am not aware of any class, representative, or other collective action in any  
26 other court, in this, or any other jurisdiction, that asserts claims similar to those asserted in  
27 this action, on behalf of the class or group of individuals, some or all of whom would also be  
28 members of the class to find in this action. I have made a reasonable inquiry of the other



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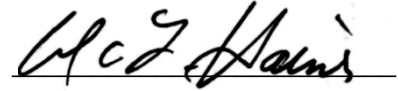
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1 members of my law firm to determine whether they are aware of any such similar actions.  
2 Based on these inquiries, I am aware of no such similar actions.

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

5 Executed on October 28, 2024 at Los Angeles, California.

6  
7 

8 WALTER L. HAINES,  
9 Declarant



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