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9 WILLIAM DENNIS O'GRADY, and all others similarly situated  
(Additional attorneys for parties on following page)

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF SAN DIEGO**

12 **(UNLIMITED JURISDICTION)**

14 WILLIAM DENNIS O'GRADY and HAROLD  
15 THOMAS, as "aggrieved employees" on behalf of  
other "aggrieved employees" under the Labor  
16 Code Private Attorneys General Act of 2004,

17 *Plaintiff(s),*

18 vs.

19 TEAM CAR CARE, LLC, a Delaware limited  
20 liability company; and DOES 1-50, inclusive,

21 *Defendant(s).*

Case No. 37-2020-00035860-CU-OE-CTL

**DECLARATION OF WALTER L.  
HAINES IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
APPROVAL OF PAGA SETTLEMENT**

**RESERVATION NO. 2913628**

Hearing Date: March 3, 2023  
Hearing Time: 9:00 a.m.  
Hearing Dept.: C-73, The Hon. Joel R.  
Wohlfeil

Action Filed: October 7, 2020  
Trial Date: Not Set



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1                   **DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR**  
2                   **APPROVAL OF PAGA 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  
5 an attorney of record for Plaintiff WILLIAM DENNIS O'GRADY ("Plaintiff") in his lawsuit  
6 against Defendant Team Car Care, LLC ("Defendant"). I am a member in good standing of the  
7 State Bar of California. I make this Declaration in support of Plaintiffs' Motion for Approval of  
8 PAGA Settlement. I make this Declaration based on my personal knowledge and if called to  
9 testify I could and would competently testify to the matters contained in this Declaration.

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

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

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

27          5.       United Employees Law Group has participated in this litigation and has  
28 performed work on behalf of Plaintiff O'Grady 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.

///



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1           6. I performed, among other things, the following tasks related to this matter:  
2 analyzed initial clients' claims; performed initial investigation inclusive of research necessary  
3 for case evaluation and searched court records relative to possible competing cases. I consulted  
4 with co-counsel as to issues relating to the prosecution of this case, participated in its settlement  
5 and reviewed all settlement papers along with orders from the court, and assisted with client  
liaison and other tasks assigned by lead counsel.

6           7. The hourly rate for my time is \$725 per hour which is my usual and customary  
7 hourly rate charged for my services in similar complex class and representative actions.

8           8. The total number of hours spent by me on this litigation is 23.70 hours through  
9 September 9, 2022.

10           9. My total lodestar amount through September 9, 2022, is \$17,182.50.

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

12           11. Out of pocket expenses for court fees are \$15.70. My out of pocket expenses for  
postage are \$20.00. Total out of pocket expenses are \$35.70.

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

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

23           Executed on September 9, 2022, at Los Angeles, California.

24             
25           WALTER L. HAINES, Declarant



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