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JENICE COLE and SHAUNA ADAMS, and all others similarly situated

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF YOLO**
(UNLIMITED JURISDICTION)

11 JENICE COLE, SHAUNA ADAMS,
12 KASSANDRA MENDIVIL, RICHARD
13 BAUTISTA, MICHAEL NEVAREZ, JOE
14 NUNEZ, and HUNTER MEELEE, on behalf of
15 themselves and all others similarly situated, and
16 as “aggrieved employees” on behalf of other
17 “aggrieved employees” under the Labor Code
18 Private Attorneys General Act of 2004,

19 *Plaintiff(s),*

20 vs.

21 STRATEGIC GREEN PARTNERS LLC
22 DOING BUSINESS AS AUTHENTIC 760, a
23 California limited liability company; IGS
24 SOLUTIONS LLC, a California limited liability
25 company; SHRYNE GROUP, INC., a California
26 corporation; STIIIZY, LLC, a California limited
27 liability company; IRONWORKS
28 COLLECTIVE, INC., DOING BUSINESS AS
BLAZE, a California corporation; TONY
HUANG, an individual; and DOES 1–50,
inclusive,

Defendant(s).

Case No. CV2021-0426

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF
PLAINTIFFS KASSANDRA
MENDIVIL, RICHARD BAUTISTA,
JENICE COLE, SHAUNA ADAMS,
MICHAEL NEVAREZ, JOE NUNEZ,
AND HUNTER MEELEE’S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

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23 STRATEGIC GREEN PARTNERS LLC DOING BUSINESS AS AUTHENTIC 760, IGS

24 SOLUTIONS LLC, SHRYNE GROUP, INC., STIIIZY, LLC, and IRONWORKS

COLLECTIVE, INC., DOING BUSINESS AS BLAZE

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

I, WALTER L. HAINES, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for Plaintiff Kassandra Mendivil in her claims against Defendants Strategic Green Partners LLC doing business as Authentic 760, IGS Solutions LLC, Shryne Group, Inc., STIIIZY, LLC, and Ironworks Collective, Inc., doing business as Blaze (collectively “Defendants”). I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement. I make this Declaration based on my personal knowledge and if called to testify I could and would competently testify to the matters contained in this Declaration.

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.

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

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.

Executed on December 7, 2023 at Los Angeles, California.


WALTER L. HAINES,
Declarant