

1 DAVID YEREMIAN & ASSOCIATES, INC.
David Yeremian (SBN 226337)
2 david@yeremianlaw.com
Roman Shkodnik (SBN 285152)
3 roman@yeremianlaw.com
535 N. Brand Blvd., Suite 705
4 Glendale, California 91203
Telephone: (818) 230-8380
5 Facsimile: (818) 230-0308

6 UNITED EMPLOYEES LAW GROUP, PC
Walter Haines (SBN 71075)
7 whaines@uelg.com
4276 Katella Ave., #301
8 Los Alamitos, CA 92649
Telephone: (562) 256-1047

9 Attorneys for Plaintiff JOHN PEHKONEN,
10 on behalf of himself and others similarly situated

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF LOS ANGELES**
13

14 JOHN PEHKONEN, on behalf of himself
15 and others similarly situated,

16 Plaintiff,

17 vs.

18 BUREAU VERITAS COMMODITIES
AND TRADE, INC. fka INSPECTORATE
19 AMERICAN CORPORATION, a Delaware
corporation; and DOES 1 through 50,
20 inclusive,

21 Defendants.
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Case No. 20STCV40104
Related Case No. 20STCV49152

Judge: Hon. Carolyn Kuhl
Department: 12
CLASS ACTION

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF
PLAINTIFF'S (1) PRELIMINARILY
APPROVING THE CLASS ACTION
SETTLEMENT, (2) APPROVING NOTICE
OF CLASS ACTION SETTLEMENT, AND
(3) SETTING HEARING FOR FINAL
APPROVAL**

Date: April 21, 2022
Time: 10:30 a.m.
Dept.: 12

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1. I am counsel of record for Plaintiff John Pehkonen (“Plaintiff”) in this action. I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiff’s 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.

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6. I performed, among other things, the following general tasks related to this matter: analyzed initial client's claims; performed initial investigation inclusive of research necessary for case evaluation and searched court records relative to possible competing cases; reviewed all settlement papers along with orders from the court, law and motion papers; and assisted with client liaison and other tasks assigned by lead counsel.

7. I have no conflicts of interest with the class or with the class representative. I am not related to any of the representative Plaintiff. I have not previously represented Defendant 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.

8. 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 penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 24th day of March 2022, at Los Angeles, California.


Walter L. Haines