

1 DAVID G. SPIVAK (SBN 179684)  
david@spivaklaw.com  
2 MAYA CHEAITANI (SBN 335777)  
maya@spivaklaw.com  
3 THE SPIVAK LAW FIRM  
4 8605 Santa Monica Bl  
PMB 42554  
5 West Hollywood, CA 90069  
Telephone: (213) 725-9094  
6 Facsimile: (213) 634-2485

7 Attorneys for Plaintiff(s),  
8 TUAN HOANG, and all others similarly situated  
(Additional attorneys for parties on following page)

9  
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF SANTA CLARA**  
12 **(UNLIMITED JURISDICTION)**

13 TUAN HOANG, on behalf of himself and as an  
14 “aggrieved employee” on behalf of other  
“aggrieved employees” under the Labor Code  
15 Private Attorneys General Act of 2004,

16 *Plaintiff,*

17 vs.

18 MDC VACUUM PRODUCTS LLC, a Delaware  
19 limited liability company; and DOES 1–50,  
inclusive,

20 *Defendants.*  
21

Case No. 21CV376678

**DECLARATION OF WALTER L.  
HAINES IN SUPPORT OF PLAINTIFF  
TUAN HOANG’S MOTION FOR  
APPROVAL OF PAGA SETTLEMENT**

Hearing Date: April 26, 2023  
Hearing Time: 1:30 p.m.  
Hearing Dept.: 19, The Honorable  
Theodore C. Zayner

Action filed: March 01, 2021



SPIVAK LAW  
EMPLOYEE RIGHTS

Mail:  
8605 Santa Monica Bl  
PMB 42554  
West Hollywood, CA 90069  
(213) 725-9094 Tel  
(213) 634-2485 Fax  
SpivakLaw.com

Office:  
1801 Century Park East  
25th Fl  
Los Angeles CA 90067

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**ADDITIONAL ATTORNEYS FOR PLAINTIFF(S)**

WALTER L. HAINES (SBN 71075)  
walter@uelglaw.com  
UNITED EMPLOYEES LAW GROUP  
4276 Katella Ave  
Suite 301  
Los Alamitos, CA 90720  
Telephone: (562) 256-1047  
Facsimile: (562) 256-1006  
  
Attorneys for Plaintiff(s),  
TUAN HOANG, and all others similarly situated



SPIVAK LAW  
EMPLOYEE RIGHTS

Mail:  
8605 Santa Monica Bl  
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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 an  
5 attorney of record for Plaintiff Tuan Hoang (“Plaintiff”) in her lawsuit against Defendant MDC  
6 Vacuum Products LLC (“Defendant”). I am a member in good standing of the State Bar of  
7 California. I make this Declaration in support of Plaintiff’s Motion for Approval of PAGA  
8 Settlement. I make this Declaration based on my personal knowledge and if called to testify I  
9 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 nature.  
11 I have been practicing law for over 40 years and I am highly experienced in actions of this  
12 nature. I am the most senior attorney at my firm, United Employees Law Group, and worked on  
13 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 Plaintiff or with the PAGA Members. I am  
20 not related to any representative Plaintiff. I have not previously represented Defendant in  
21 any matter. I do not represent opposing factions within the PAGA Members in that all claims  
22 are predicated upon the same theories of liability and benefit all PAGA Members equally. In  
23 sum, I am well-suited to act as Plaintiff’s counsel and will continue to vigorously represent the  
24 interests of the PAGA Members.

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

28                  5. United Employees Law Group has participated in this litigation and has performed  
work on behalf of Plaintiff since the inception of this litigation. The hours submitted with this



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1 declaration are solely for work performed on behalf of the PAGA Members alleged in the above-  
2 entitled California action and not any other state or federal matter.

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

8 7. The hourly rate for my time is \$725.00 per hour which is my usual and customary  
9 hourly rate charged for my services in similar complex class and representative actions.

10 8. The total number of hours spent by me on this litigation is 26.30 hours through  
11 December 29, 2022.

12 9. My total lodestar amount through December 29, 2022 is \$ 19,067.50.

13 10. My out-of-pocket expenses for court fees are \$4.00. These fees are paid to various  
14 courts to obtain records in order to determine if there is a similar case already on file in any court.

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

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

3 Executed on January 20, 2023 at Los Angeles, California.

4 

5 WALTER L. HAINES,  
6 Declarant



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