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Attorneys for Plaintiff, the Class, and Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF TULARE

CARL HANEY, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

PENINSULA PACKAGING, LLC, a
California limited liability company; and
DOES 1 through 50, inclusive,

Defendants.

Case No.: VCU285695

[Assigned for all purposes to the Hon. Bret
Hillman, Dept. 7]

**DECLARATION OF CARL HANEY IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: December 6, 2022

Time: 8:30 A.M.

Dept.: 7

Complaint Filed: January 25, 2021

FAC Filed: January 6, 2022

Trial Date: None Set

DECLARATION OF CARL HANEY

I, Carl Haney, declare as follows:

1. I am an individual over the age of 18. I am the named plaintiff in the above-reference action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I was employed by Defendant Peninsula Packaging, LLC ("Defendant") as a Warehouse Lineman from about August 12, 2019, to about July 31, 2020. During my employment, I was paid sick pay at an hourly rate that was lower than the regular hourly rate of pay for regular hours worked. Further, as a result of the underpaid sick pay wages, I did not receive accurate itemized wage statements that indicate the correct hourly rates of pay, gross wages earned, and net wages earned.

3. I provide this declaration in support of the Motion for Final Approval of Class Action Settlement.

4. During the pendency of this lawsuit, I was required to provide assistance to my attorneys to aid in the prosecution of this lawsuit. I have spent a significant amount of time discussing the case with my attorneys in connection with the assistance and prosecution of this lawsuit. I estimate that I spent approximately 25 hours, including the following:

- Several telephonic discussions with my attorneys regarding the lawsuit and the facts involved, as well as explaining my understanding of Defendant's various payroll practices during my period of employment;
- Searching for and providing documents in connection with this lawsuit, including various employment documents and memoranda, the employee handbook and other policies that were provided to me during my employment, attendance reports, and the paystubs that were issued to me;
- Reviewing various documents and pleadings in this case, including my PAGA letter submitted to the state, the complaint, the settlement agreement and the

1 amendment thereto, and my declarations in this case;

- 2 • Regularly providing information to my attorneys and responding to any
3 questions; and
4 • Reviewing and executing the settlement agreement and the amendment thereto.

5 5. I have and continue to be willing to assist in the investigation of this matter as
6 well as make myself available for deposition, trial, or any further proceedings in this matter as
7 required to represent the interests of the Class. I also understand my duties and responsibilities
8 to the proposed Class and will carry out those duties as necessary.

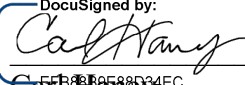
9 6. I have discussed the terms of the Settlement Agreement with my attorneys, and
10 based on the information provided, I believe the Settlement to be fair, adequate, and reasonable
11 for myself and for the entire Class.

12 7. I understand that I could have been liable for Defendant's legal fees and costs
13 had Defendant prevailed. I also understand that this lawsuit was filed in the public court
14 records, which may affect my ability to obtain future employment.

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

17 Executed on this 4th day of November, 2022, at Farmersville, California.

18 DocuSigned by:

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20 Carl Haney

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