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7 Attorneys for Plaintiff,

8 NICOLE SHAVER, and all others similarly situated

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF SAN BERNARDINO**

11 **(UNLIMITED JURISDICTION)**

12
13 NICOLE SHAVER, on behalf of herself, all
14 others similarly situated, and the general public,
15 and as an “aggrieved employee” on behalf of
16 other “aggrieved employees” under the Labor
Code Private Attorneys General Act of 2004,

17 *Plaintiff(s),*

18 vs.

19 G AND C SWAN, INC., a California
20 corporation; and DOES 1–50, inclusive,

21 *Defendant(s).*

Case No. CIVSB2103630

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
NICOLE SHAVER’S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: June 17, 2024

Hearing Time: 1:30 p.m.

Hearing Dept.: S-17, The Honorable
Joseph T. Ortiz

Action filed: February 17, 2021

Trial Date: Not Set



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1 **DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR**
2 **PRELIMINARY APPROVAL OF CLASS ACTION 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 Nicole Shaver (“Plaintiff”) in her lawsuit against Defendant G and
6 C Swan, Inc. (“Defendant”). I am a member in good standing of the State Bar of California. I
7 make this Declaration in support of Plaintiff’s Motion for Preliminary Approval of Class Action
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
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 hour
15 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, Home
17 Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co., Yahoo!,
18 WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

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

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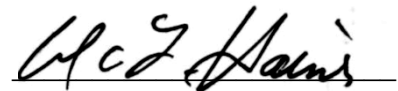
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1 4. I am not aware of any class, representative, or other collective action in any
2 other court, in this, or any other jurisdiction, that asserts claims similar to those asserted in
3 this action, on behalf of the class or group of individuals, some or all of whom would also be
4 members of the class to find in this action. I have made a reasonable inquiry of the other
5 members of my law firm to determine whether they are aware of any such similar actions.
6 Based on these inquiries, I am aware of no such similar actions.

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

9 Executed on May 1, 2024 at Los Angeles, California.

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12 WALTER L. HAINES,
13 Declarant
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