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12 Attorneys for Plaintiff,
13 THERESEA RIVES

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF MARIN**
16 **(UNLIMITED JURISDICTION)**

17 THERESEA RIVES, as an “aggrieved
18 employee” on behalf of other “aggrieved
19 employees” under the Labor Code Private
Attorneys General Act of 2004,

20 *Plaintiff,*

21 vs.

22 CF SAN RAFAEL, LLC, a California
23 limited liability company; ~~CAMBRIDGE~~
24 ~~HEALTHCARE SERVICES, LLC, a~~
25 ~~California limited liability company;~~ and
DOES 1–50, inclusive,

26 *Defendant(s).*

Case No.: CIV2100671

**DECLARATION OF WALTER HAINES IN
SUPPORT OF PLAINTIFF THERESEA
RIVES’ MOTION FOR APPROVAL OF
PAGA SETTLEMENT**

Action filed: 2/18/2021

Hearing Date:

Hearing 1:30 p.m.

Time:

Department: Courtroom B, Hon. James Chou



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1 **DECLARATION OF WALTER HAINES IN SUPPORT OF PLAINTIFF’S MOTION**
2 **FOR APPROVAL OF PAGA SETTLEMENT**

3 I, WALTER HAINES, declare as follows:

4 1. I am counsel of record for Plaintiff Theresea Rives (hereafter referred to as
5 “Plaintiff” or “Rives”) in this action against Defendant CF San Rafael, LLC (“Defendant”). I am
6 a member in good standing of the State Bar of California. I make this Declaration in support of
7 Plaintiff’s Motion for Approval of PAGA Settlement and Release. I make this Declaration based
8 on my personal knowledge and if called to testify I could and would competently testify to the
9 matters contained in this Declaration.

10 2. I am highly experienced in class and representative action litigation specializing
11 in actions of this nature. I have been practicing law for over 40 years and I am highly experienced
12 in actions of this nature. I am the most senior attorney in my firm, United Employees Law Group,
13 and worked on the litigation of this matter. I formed United Employees Law Group in 2005,
14 primarily to represent employees in their wage claims. I have represented over 1,500 clients in
15 wage and hour disputes of which more than 300 cases were class actions with settlements totaling
16 over \$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
20 am 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 are
22 predicated upon the same theories of liability and benefit all PAGA Members equally. In sum, I
23 am well-suited to act as Plaintiff’s counsel and will continue to vigorously represent the interests
24 of the PAGA Members.

25 4. United Employees Law Group has prosecuted this litigation solely on a
26 contingent-fee basis, and has been completely at risk that it would not receive any compensation
27 for 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 declaration are solely for work performed on behalf of the PAGA Members alleged in



the above-entitled California action and not any other state or federal matter.

6. I performed, among other things, the following tasks related to this matter: analyzed initial clients' claims; performed initial investigation inclusive of research necessary for case evaluation and searched court records relative to possible competing cases. I participated in its mediation and settlement and 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. The hourly rate for my time is \$725 per hour which is my usual and customary hourly rate charged for my services in similar complex class and representative actions.

8. The total number of hours spent by me on this litigation is 16.70 hours through May 16, 2022.

9. My total lodestar amount through May 16, 2022 is \$12,107.50.

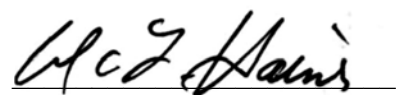
10. No charges have been included for paralegal or staff time spent on this matter.

11. Out of pocket expenses for court fees are \$0.00. My out of pocket expenses for postage are \$8.00. Total out of pocket expenses are \$8.00

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

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 May 16, 2022 at Los Angeles, California.


WALTER HAINES,
Declarant