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7 Attorneys for Plaintiff(s),

8 CHARLES MIKICH, JONATHON GORDON, and all others similarly situated

9 (Additional attorneys for Plaintiff(s) on following page)

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF SAN FRANCISCO**

12 **(UNLIMITED JURISDICTION)**

14 CHARLES MIKICH, on behalf of himself and  
15 all others similarly situated, and as an “aggrieved  
16 employee” on behalf of other “aggrieved  
17 employees” under the Labor Code Private  
Attorneys General Act of 2004,

18 *Plaintiff(s),*

19 vs.

20 SAYEH PETROLEUM, INC., a California  
21 corporation; HEDIA PETROLEUM, INC., a  
22 California corporation; HADAD ENTERPRISE,  
INC., a California corporation; HADAD  
23 PETROLEUM, INC., a California corporation;  
BAY AREA AUTO CARE, INC., a California  
24 corporation; HOUTAN PETROLEUM, INC. a  
California corporation; GREEN PLANET GAS,  
25 INC., a California corporation; ALI  
BOZORGHADAD (also known as ED  
26 BOZORGHADAD, also known as ED  
HADAD), an individual; and DOES 8-50,  
27 inclusive,

28 *Defendant(s).*

Case No. CGC-20-582385 to be  
consolidated with CGC-21-594289

**DECLARATION OF WALTER L.  
HAINES IN SUPPORT OF  
PLAINTIFFS CHARLES MIKICH  
AND JONATHON GORDON’S  
MOTION FOR PRELIMINARY  
APPROVAL OF FIRST AMENDED  
CLASS ACTION SETTLEMENT**

Hearing Date: April 29, 2024  
Hearing Time: 9:30 a.m.  
Hearing Dept.: 302, The Honorable  
Richard Ulmer

Action filed: January 22, 2020  
Trial Date: Not Set



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JONATHON GORDON on behalf of himself  
and all others similarly situated, and as an  
“aggrieved employee” on behalf of other  
“aggrieved employees” under the Labor Code  
Private Attorney General Act of 2004,

*Plaintiff(s),*

vs.

SAYEH PETROLEUM, INC., a California  
corporation; HEDIA PETROLEUM, INC., a  
California corporation; HADAD ENTERPRISE,  
INC., a California corporation; HADAD  
PETROLEUM, INC., a California corporation;  
BAY AREA AUTO CARE, INC., a California  
corporation; HOUTAN PETROLEUM, INC. a  
California corporation; GREEN PLANET GAS,  
INC., a California corporation; ALI  
BOZORGHADAD (also known as ED  
BOZORGHADAD also known as ED HADAD),  
an individual; and DOES 1-50, inclusive,

*Defendant(s).*

Case No.: CGC-21-594289

Action Filed: 08/04/2021  
Dept: 610, Hon. Garrett L.  
Wong



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CHARLES MIKICH, JONATHON GORDON, and all others similarly situated



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  
5 an attorney of record for Plaintiffs Charles Mikich, Jonathon Gordon, and all others similarly  
6 situated (collectively "Plaintiffs") in his lawsuit against Defendants Sayeh Petroleum, Inc.,  
7 Hedia Petroleum, Inc., Hadad Enterprise, Inc., Hadad Petroleum, Inc., Bay Area Auto Care, Inc.,  
8 Houtan Petroleum, Inc., Ali Bozorghadad, and Green Planet Gas, Inc. (collectively  
9 "Defendants"). I am a member in good standing of the State Bar of California. I make this  
10 Declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action  
11 Settlement. I make this Declaration based on my personal knowledge and if called to testify I  
12 could and would competently testify to the matters contained in this Declaration.

13           2.       I am a highly experienced class action counsel specializing in actions of this  
14 nature. I have been practicing law for over 40 years and I am highly experienced in actions of  
15 this nature. I am the most senior attorney at my firm, United Employees Law Group, and worked  
16 on the litigation of this matter. I formed United Employees Law Group in 2005, primarily to  
17 represent employees in their wage claims. I have represented over 1,500 clients in wage and  
18 hour disputes of which more than 300 cases were class actions with settlements totaling over  
19 \$400,000,000. These class action cases include Fortune 500 companies such as Pepsi, Intel,  
20 Home Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co.,  
21 Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

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

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

Executed on Wednesday, February 28, 2024 at Los Angeles, California.

  
WALTER L. HAINES,  
Declarant



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