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7 Attorneys for Plaintiff,  
8 SHELIA CROMWELL, AARON SALAZAR,  
ANDREW FORREST, 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 BERNARDINO**  
12 **(UNLIMITED JURISDICTION)**

14 SHELIA CROMWELL, AARON SALAZAR,  
15 and ANDREW FORREST, on behalf of  
16 themselves, all others similarly situated, and as  
17 “aggrieved employees” on behalf of other  
“aggrieved employees” under the Labor Code  
Private Attorney General Act of 2004,,  
18

19 *Plaintiff(s),*

20 vs.

21 DESERT CREMATION SOCIETY, INC., a  
California corporation; ~~WIEFELS & SON, a~~  
22 ~~California corporation;~~ WIEFELS & SON II,  
INC., a California corporation; ~~WIEFELS FD,~~  
23 ~~INC., a California corporation;~~ and DOES 1–50,  
24 inclusive,

25 *Defendant(s).*

Case No. CIVSB2116331

**DECLARATION OF WALTER L.  
HAINES IN SUPPORT OF  
PLAINTIFFS’ MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Hearing Date: February 13, 2024  
Hearing Time: 1:30 p.m.  
Hearing Dept.: S17, The Honorable  
Joseph T. Ortiz

Action filed: June 04, 2021



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SHELIA CROMWELL, AARON SALAZAR,  
ANDREW FORREST, and all others similarly situated



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1     **DECLARATION OF WALTER L. HAINES IN SUPPORT OF PLAINTIFFS' MOTION**  
2     **FOR 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 Plaintiffs Aaron Salazar, Shelia Cromwell, and Andrew Forrest  
6     (collectively "Plaintiffs") in their lawsuit against Defendants Desert Cremation Society, Inc. and  
7     Wiefels & Son II, Inc. (collectively "Defendants"). I am a member in good standing of the State  
8     Bar of California. I make this Declaration in support of Plaintiffs' Motion for Preliminary  
9     Approval of Class Action Settlement. I make this Declaration based on my personal knowledge  
10    and if called to testify I could and would competently testify to the matters contained in this  
11    Declaration.

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

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

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



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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.

3 Executed on January 22, 2024, at Los Angeles, California.

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6 WALTER L. HAINES,  
7 Declarant  
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