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11 Attorneys for Plaintiff,

12 MARIA ELENA DIAZ HERNANDEZ, and all others similarly situated

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **FOR THE COUNTY OF SACRAMENTO**

15 **(UNLIMITED JURISDICTION)**

16 MARIA ELENA DIAZ HERNANDEZ, on
17 behalf of herself, all others similarly situated, the
18 general public, and as an “aggrieved employee”
19 on behalf of other “aggrieved employees” under
20 the Labor Code Private Attorneys General Act of
21 2004,

22 *Plaintiff(s),*

23 vs.

24 GUITRON ALCAZAR ALCAZAR INC., a
25 California corporation doing business as El
26 Tapatio Mexican Cuisine; GUITRON
27 ALCAZAR III, INC, a California corporation;
28 GUITRON ALCAZAR IV, LLC, a California
limited liability company; and DOES 3–50,
inclusive,

Defendant(s).

Case No. 34-2021-00306648

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
MARIA ELENA DIAZ HERNANDEZ’S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Date: March 1, 2024
Hearing Time: 9:00 a.m.
Reservation No: A-306648-001
Hearing Dept.: 28, The Honorable
Lauri A. Damrell

Action filed: August 23, 2021



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1 **DECLARATION OF WALTER L. HAINES IN SUPPORT OF PLAINTIFF MARIA**
2 **ELENA DIAZ HERNANDEZ'S MOTION FOR PRELIMINARY APPROVAL OF**
3 **CLASS ACTION SETTLEMENT**

4 I, WALTER L. HAINES, declare as follows:

5 1. I am an attorney duly licensed to practice law in the State of California and am an
6 attorney of record for Plaintiff Maria Elena Diaz Hernandez ("Plaintiff") in her lawsuit against
7 Defendants Guitron Alcazar Alcazar Inc. dba El Tapatio Mexican Cuisine, Guitron Alcazar III
8 Inc., and Guitron Alcazar IV, LLC (collectively "Defendants"). I am a member in good standing
9 of the State Bar of California. I make this Declaration in support of Plaintiff's Motion for
10 Preliminary Approval of Class Action Settlement. I make this Declaration based on my personal
11 knowledge and if called to testify I could and would competently testify to the matters contained
12 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 this
15 nature. I am the most senior attorney at my firm, United Employees Law Group, and worked on
16 the litigation of this matter. I formed United Employees Law Group in 2005, primarily to represent
17 employees in their wage claims. I have represented over 1,500 clients in wage and hour disputes
18 of which more than 300 cases were class actions with settlements totaling over \$400,000,000.
19 These class action cases include Fortune 500 companies such as Pepsi, Intel, Home Depot, Kaiser,
20 Wells Fargo, Bank of America, Cisco Systems, First American Title Co., Yahoo!, WellPoint, Inc.,
21 Sun Microsystems, and Kaiser Foundation Hospitals.

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

27 4. I am not aware of any class, representative, or other collective action in any
28 other court, in this, or any other jurisdiction, that asserts claims similar to those asserted in
this action, on behalf of the class or group of individuals, some or all of whom would also be



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1 members of the class to find in this action. I have made a reasonable inquiry of the other
2 members of my law firm to determine whether they are aware of any such similar actions.
3 Based on these inquiries, I am aware of no such similar actions.

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

6 Executed on Thursday, November 16, 2023 at Los Angeles, California.

7 
8 WALTER L. HAINES,
9 Declarant



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