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8 MICHAEL M. CANTRELL, and all others similarly situated
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9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF ORANGE**
12 **(UNLIMITED JURISDICTION)**

13 MICHAEL M. CANTRELL, on behalf of
14 himself, all others similarly situated, the general
15 public, and as an “aggrieved employee” on
16 behalf of other “aggrieved employees” under the
Labor Code Private Attorneys General Act of 2004,

17 *Plaintiff,*

18 vs.

19 CONCRETE PLACEMENT, INC., a California
20 corporation and COLLIN FLEMING; and DOES
1–50, inclusive,

21 *Defendants.*

Case No. 30-2021-01225534-CU-OE-CXC

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
MICHAEL M. CANTRELL’S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT
RESERVATION NO.: 73918762**

Hearing Date: 2/24/2023
Hearing Time: 9:00 a.m.
Hearing Dept.: CX104, The Honorable
William D. Claster

Action filed: October 07, 2021
Trial Date: None set



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ADDITIONAL ATTORNEY FOR PLAINTIFF

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I, WALTER L. HAINES, declare as follows:

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

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

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 Thursday, January 05, 2023 at Los Angeles, California.


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