

1 DAVID G. SPIVAK (SBN 179684)
david@spivaklaw.com
2 CAROLINE TAHMASSIAN (SBN 285680)
caroline@spivaklaw.com
3 THE SPIVAK LAW FIRM
4 8605 Santa Monica Bl
PMB 42554
5 West Hollywood, CA 90069
Telephone: (213) 725-9094
6 Facsimile: (213) 634-2485

7 WALTER L. HAINES (SBN 71075)
8 walter@uelglaw.com
UNITED EMPLOYEES LAW GROUP
9 4276 Katella Ave
Suite 301
10 Los Alamitos, CA 90720
Telephone: (562) 256-1047
11 Facsimile: (562) 256-1006

12 Attorneys for Plaintiff,
13 DEAN CRUMPLER, and all others similarly situated

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

15 **FOR THE COUNTY OF FRESNO**

16 **(UNLIMITED JURISDICTION)**

17 DEAN CRUMPLER, on behalf of himself, all
18 others similarly situated, the general public, and
19 as an “aggrieved employee” on behalf of other
“aggrieved employees” under the Labor Code
20 Private Attorneys General Act of 2004,

21 *Plaintiff(s),*

22 vs.

23 WESTCO EQUITIES, INC. DBA WESTCO
24 PROPERTY MANAGEMENT, a California
corporation; and DOES 1–50, inclusive,

25 *Defendant(s).*
26
27
28

Case No. 21CECG02993

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
DEAN CRUMPLER’S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**



SPIVAK LAW
Employee Rights Attorneys

Mail:
8605 Santa Monica Bl
PMB 42554
West Hollywood, CA 90069
(213) 725-9094 Tel
(213) 634-2485 Fax
SpivakLaw.com

Office:
1801 Century Park East
25th Fl
Los Angeles, CA 90067

I, WALTER L. HAINES, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for Plaintiff Dean Crumpler (“Plaintiff”) in his lawsuit against Defendant Westco Equities, Inc. dba Westco Property Management (“Defendant”). I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement. I make this Declaration based on my personal knowledge and if called to testify I could and would competently testify to the matters contained in this Declaration.

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 Defendant 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 Tuesday, February 21, 2023 at Los Angeles, California.

WALTER L. HAINES
WALTER L. HAINES,
Declarant

