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9 FELIS A. PEREZ, and all others similarly situated  
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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **FOR THE COUNTY OF SANTA CLARA**  
13 **(UNLIMITED JURISDICTION)**

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

17 *Plaintiff(s),*

18  
19 vs.

20 NXEDGE MH, LLC, a Delaware limited  
liability company; NXEDGE SAN CARLOS,  
21 LLC, a Delaware limited liability company;  
22 NXEDGE CSL, LLC, a Nevada limited liability  
company; and DOES 3–50, inclusive,

23 *Defendant(s).*  
24

Case No. 21CV387173

**DECLARATION OF WALTER L.  
HAINES IN SUPPORT OF PLAINTIFF  
FELIS A. PEREZ’S MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Hearing Date: February 8, 2023  
Hearing Time: 1:30 p.m.  
Hearing Dept.: 3, The Honorable  
Patricia M. Lucas  
Action filed: September 29, 2021



SPIVAK LAW  
EMPLOYEE RIGHTS

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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 Friday, October 28, 2022 at Los Angeles, California.



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