

1 DAVID G. SPIVAK (SBN 179684)

david@spivaklaw.com

2 MAYA CHEAITANI (SBN 335777)

maya@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

10 Suite 301

Los Alamitos, CA 90720

11 Telephone: (562) 256-1047

12 Facsimile: (562) 256-1006

13 Attorneys for Plaintiff,

14 LUIS LARRABURU, and all others similarly situated

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

16 **FOR THE COUNTY OF LOS ANGELES**

17 **(UNLIMITED JURISDICTION)**

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

22 *Plaintiff(s),*

23 vs.

24 AMERICAN MERCHANDISING
SPECIALISTS, INC., a North Carolina
corporation; and DOES 1–50, inclusive,

27 *Defendant(s).*

Case No. 21STCV17704

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

Hearing Date: September 1, 2022

Hearing Time: 10:00 a.m.

Hearing Dept.: SSC-9, The Honorable
Yvette M. Palazuelos

Action filed: May 11, 2021



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:
15303 Ventura Bl
Ste 900
Sherman Oaks, CA 91403

1 **DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR**
2 **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
5 an attorney of record for Plaintiff Luis Larraburu (“Plaintiff”) in his lawsuit against Defendant
6 American Merchandising Specialists, Inc. (“Defendant”). I am a member in good standing of
7 the State Bar of California. I make this Declaration in support of Plaintiff’s Motion for
8 Preliminary Approval of Class Action Settlement. I make this Declaration based on my
9 personal knowledge and if called to testify I could and would competently testify to the
10 matters contained in this Declaration.

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

21 3. I have no conflicts of interest with the class or with the LUIS LARRABURU. I
22 am not related to the representative plaintiff. I have not previously represented Defendant in
23 any matter. I do not represent opposing factions within the class in that all claims are
24 predicated upon the same theories of liability and benefit all class members equally. In sum, I
25 am well-suited to act as shall mean the attorneys representing Plaintiff in the Action: David G.
26 Spivak of The Spivak Law Firm and Walter L. Haines of United Employees Law Group and
27 will continue to vigorously represent the interests of the class.

28 I declare under the penalty of perjury of the laws of the State of California that the



SPIVAK LAW

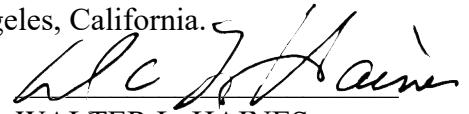
Employee Rights Attorneys

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

Office:
15303 Ventura Bl
Ste 900
Sherman Oaks, CA 91403

1 foregoing is true and correct to the best of my knowledge.

2 Executed on Wednesday, June 01, 2022 at Los Angeles, California.

3 

4 WALTER L. HAINES,
5 Declarant



25 SPIVAK LAW

26 Employee Rights Attorneys

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

28 Office:
15303 Ventura Bl
Ste 900
Sherman Oaks, CA 91403