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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SANTA CLARA**

LINDSEY SUMNICHT, ZOLA STAMPER, and  
FARRAH ALIZADEH, individuals, on behalf of  
themselves and on behalf of all persons similarly  
situated,

Plaintiffs,

v.

AMN SERVICES, LLC, a Limited Liability  
Company, and DOES 1 through 50, inclusive,

Defendants.

Case No. **22CV397191**

**DECLARATION OF PAUL K. HAINES IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION AND PAGA ACTION  
SETTLEMENT**

Judge: Hon. Theodore Zayner  
Dept.: 19

Action Filed: April 22, 2022  
Trial Date: Not set

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I, Paul K. Haines, declare as follows:

1. I am a shareholder and principal of the law firm Haines Law Group, APC and counsel for one of the named plaintiffs in this action, Farrah Alizadeh (“Plaintiff”). I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I am a 2006 graduate of Pepperdine University School of Law, where I graduated *cum laude*. During law school, I worked as a law clerk for the appellate firm of Horvitz & Levy, located in Encino, California. I also spent a semester in law school working as an extern for the Honorable Edward Rafeedie, District Judge for the United States District Court for the Central District of California.

3. Since graduating from law school, my practice focused almost exclusively on employment litigation. In September 2007, I began working as an associate attorney at the international law firm of Littler Mendelson P.C., at its Los Angeles office, which according to its website is the “largest U.S.-based law firm exclusively devoted to representing management in every aspect of labor and employment law.” While at Littler Mendelson, I was primarily staffed on wage and hour class actions in both state and federal courts, and I also worked on a number of single and multi-plaintiff wage and hour matters as well.

4. During my employment at Littler Mendelson, I played a significant role in the class actions that I was staffed on, as I was often the only associate staffed on such cases. In particular, I received a wide array of wage and hour class action experience performing the following types of tasks: drafting demurrers and motions to strike and/or dismiss; removing actions from state court to federal court; drafting and responding to written discovery; drafting and opposing discovery related motions; arguing discovery related motions; drafting motions to consolidate related matters; interviewing putative class members and obtaining declarations in connection with class certification; drafting oppositions to motions for class certification; drafting motions for decertification following class certification; conducting exposure analyses to assess the strengths and weaknesses of asserted claims, the likelihood of prevailing at class certification, and potential damages resulting from such claims; drafting mediation briefs; serving as the primary contact to in-house counsel; deposing named plaintiffs and putative class members; deposing retained expert witnesses; and defending the depositions of corporate witnesses. In short, I played an

1 integral role in all aspects of litigation from the inception of a matter through and beyond class  
2 certification. I also supervised the work of several junior attorneys who were staffed on the same wage  
3 and hour class actions.

4 5. In June 2011, I voluntarily resigned from Littler Mendelson in order to accept an associate  
5 attorney position with the international law firm of Morgan, Lewis & Bockius LLP, at its Los Angeles  
6 office, where I began working in July 2011. During my employment at Morgan, Lewis & Bockius, I  
7 worked exclusively on the defense of wage and hour class and collective actions. For the majority of cases  
8 that I worked on, I was the only associate staffed on the case, and I performed the same job duties as  
9 described in the immediately preceding paragraph. In addition to working on wage and hour class actions,  
10 at Morgan, Lewis & Bockius I also worked on a number of “hybrid” actions asserting nationwide wage  
11 and hour claims under the Fair Labor Standards Act, as well as California-specific claims under Rule 23  
12 of the Federal Rules of Civil Procedure..

13 6. In July 2012, I transitioned into litigating wage and hour class actions from the Plaintiff’s  
14 side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since February 2016 as a  
15 Shareholder of Haines Law Group, APC. Currently, over ninety percent (90%) of my practice is dedicated  
16 exclusively to the prosecution of wage and hour class actions, and my law firm is currently responsible  
17 for prosecuting over fifty (50) wage and hour class actions filed in both State and Federal courts  
18 throughout California. I have been appointed as Class Counsel in over seventy-five (75) wage and hour  
19 class action settlements in state and federal courts within California. A few examples of the matters in  
20 which I have been appointed as Class Counsel, all of which have been granted final approval, include the  
21 following: *Sanchez v. Res-Care, Inc.*, Case No. BC526175, California Superior Court, County of Los  
22 Angeles, Honorable John S. Wiley, presiding; *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-  
23 3170 JFW (Ex), United States District Court, Central District of California, Honorable Judge John F.  
24 Walter, presiding; *Tesla Motors Wage and Hour Litigation*, JCCP 4792, California Superior Court, Santa  
25 Clara County, Judge Peter H. Kirwan presiding; *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG,  
26 United States District Court, Northern District of California, Honorable Judge Haywood S. Gilliam, Jr.  
27 presiding; *Longstreth v. PAQ, Inc., dba Food 4 Less*, Case No. 15CV-0206, California Superior Court,  
28 County of San Luis Obispo, Honorable Judge Charles S. Crandall, presiding; *Nunez v. CompuCom*

1 *Systems, Inc.*, Case No. BC618385, California Superior Court, County of Los Angeles, Honorable Judge  
2 John Shepard Wiley, Jr. presiding; *Mansilla v. Haeco Americas Line Services, LLC, et al.*, Case No.  
3 BC615310, Superior Court of California, County of Los Angeles, Honorable Judge Elihu M. Berle  
4 presiding; *Khosravi v. Enterprise Rent-A-Car Company of Los Angeles*, Case No. 30-2016-00829923-  
5 CU-OE-CXC, California Superior Court, County of Orange, Judge Thierry Patrick Colaw, presiding (in  
6 which I was approved for an hourly rate of \$600 for work performed in 2016 and 2017); *Nieves v. Ta*  
7 *Chen International, Inc.*, Case No. BC609005, Superior Court of California, County of Los Angeles,  
8 Honorable Judge Kenneth R. Freeman presiding (approved at an hourly rate of \$600 for work performed  
9 in 2016 and 2017); *Berkel v. Pride Bakeries, LLC*, Case No. 30-2017-00923148-CU-OE-CXC, Superior  
10 Court of California, County of Orange, Honorable Judge William Claster presiding; *Ruvalcaba Quiroz v.*  
11 *Circle M Contractors, Inc.*, Case No. 30-2016-00885065-CU-OE-CXC, Superior Court of California,  
12 County of Orange, Honorable William D. Claster presiding; *Armenta, et al., v. California Friends Homes*  
13 *d/b/a Quaker Gardens*, Case No. 30-2016-00883282-CU-OE-CXC, Superior Court of California, County  
14 of Orange, Honorable Randall J. Sherman presiding (approving an hourly rate of \$600 for work performed  
15 in 2016, 2017 and 2018); *Tina Arellano v. Williams Sonoma Stores, Inc.*, Case No. BC693760, Los  
16 Angeles County Superior Court, Honorable Daniel J. Buckley, presiding (approving an hourly rate of  
17 \$650 for work performed in 2018 and 2019); *William Cuellar v. UMA Enterprises, Inc.*, Case No.  
18 BC657146, Los Angeles County Superior Court, Honorable Maren E. Nelson, presiding (approving an  
19 hourly rate of \$650 for work performed in 2017, 2018 and 2019); *Maria C. Garcia, et al. v. Simplified*  
20 *Labor Staffing Solutions, Inc.*, Case No. BC696898, Los Angeles County Superior Court, Honorable Elihu  
21 M. Berle, presiding (approving an hourly rate of \$650 for work performed in 2018 and 2019); *Arturo*  
22 *Delgado v. Spears Manufacturing Co.*, Case No. BC709665, Los Angeles County Superior Court,  
23 Honorable Maren E. Nelson, presiding (approving an hourly rate of \$650 for work performed in 2018,  
24 2019, and 2020); *Lucia Kang, et al., v. Extra Space Management, Inc.*, Case No. 30-2018-00997364-CU-  
25 OE-CXC, Orange County Superior Court, Honorable William Claster, presiding; *Ramon Soto v. L I Metal*  
26 *Systems*, Case No. 37-2017-00009607-CU-OE-CTL, San Diego County Superior Court, Honorable  
27 Timothy Taylor, presiding (approving an hourly rate of \$650 for work performed in 2017-2020); *Michael*  
28 *Fishback v. Paragon Framing, Inc.*, Case No. CIVDS1906610, San Bernardino County Superior Court,

1 Honorable David Cohn, presiding (approving an hourly rate of \$650 for work performed in 2019 and  
2 2020); *Carlos Perez v. Moss Bros. Auto Group, Inc., et al.*, Case No. RIC1709905, Riverside County  
3 Superior Court, Honorable Sunshine S. Sykes, presiding (approving an hourly rate of \$650 for work  
4 performed in 2017-2019); *Francisco Garcia v. Searing Industries, Inc.*, Case No. CIVDS1932477, San  
5 Bernardino County Superior Court, Honorable David Cohn, presiding (approving an hourly rate of \$650  
6 for work performed in 2019 and 2020); *Ahmad Teeba v. Brill, Inc.*, Case No. CIVDS1923242, San  
7 Bernardino County Superior Court, Honorable David Cohn, presiding (approving an hourly rate of \$650  
8 for work performed in 2019-2021); *David Hasler, et al. v. Anheuser-Busch, LLC*, Case No.  
9 19STCV00802, Los Angeles County Superior Court, Honorable Daniel J. Buckley, presiding; *Angel*  
10 *Ochoa v. Fonseca Construction, Inc.*, Case No. CIVDS1928625, San Bernardino County Superior Court,  
11 Honorable David Cohn, presiding (approving an hourly rate of \$650 for work performed in 2019 to 2021);  
12 *William Chang v. Avcorp Composite Fabrication, Inc.*, Case No. BC715159, Los Angeles County  
13 Superior Court, Honorable Amy D. Hogue, presiding (approving an hourly rate of \$650 for work  
14 performed in 2018 to 2021); *David Alvarado, et al. v. J.G. Boswell Company*, Case No. 19STCV19033,  
15 Los Angeles County Superior Court, Honorable Daniel J. Buckley, presiding (approving an hourly rate of  
16 \$650 for work performed in 2019 to 2021); *Alejandra Parra v. Sixty Collective, LLC*, Case No.  
17 19STCV01016, Los Angeles County Superior Court, Honorable Carolyn B. Kuhl, presiding (approving  
18 an hourly rate of \$650 for work performed in 2019-2022); *Veronica Gonzalez v. Precision Hospitality &*  
19 *Development, LLC*, Case No. 30-2020-01127597-CU-OE-CXC, Orange County Superior Court,  
20 Honorable Randall J. Sherman, presiding (approving an hourly rate of \$650 for work performed in 2020-  
21 2021); *Steve Qawas v. Socal Framing, Inc.*, Case No. RIC1902588, Riverside County Superior Court,  
22 Honorable Sunshine S. Sykes, presiding (approving an hourly rate of \$675 for work performed in 2019-  
23 2022); *Jessica Burrola v. Trademark Cosmetics, Inc.*, Case No. RIC2002311, Riverside County Superior  
24 Court, Honorable Sunshine S. Sykes, presiding (approving an hourly rate of \$675 for work performed in  
25 2020-2022); *Elmy Calderon v. Personnel Staffing Group, LLC*, Case No. VCU278910, Tulare County  
26 Superior Court, Honorable David C. Mathias, presiding (approving an hourly rate of \$675 for work  
27 performed in 2019-2022); *Santos Orellana v. Smarte Carte, Inc.*, Case No. 20STCV08890, Los Angeles  
28 County Superior Court, Honorable Yvette M. Palazuelos, presiding (approving an hourly rate of \$675 for

1 work performed in 2020-2022); *Luis Montanez v. MEI Rigging & Crating, LLC, et al.*, Case No.  
2 21STCV04062, Los Angeles County Superior Court, Honorable Carolyn B. Kuhl, presiding (approving  
3 an hourly rate of \$675 for work performed in 2021-2022); *Ketema Nelson v. Santini Foods, Inc.*, Case No.  
4 RG21090890, Alameda County Superior Court, Honorable Evelio Grillo, presiding (approving an hourly  
5 rate of \$675 for work performed in 2021-2022); *Edward Salgado v. S.R. Bray LLC, dba Power Plus!, et*  
6 *al.*, Case No. 30-2020-01172134-CU-OE-CXC, Orange County Superior Court, Honorable Lon F.  
7 Hurwitz, presiding (approving an hourly rate of \$750 for work performed in 2020-2023); *Santiago*  
8 *Gutierrez v. M.M.C.L., Inc. dba California Landcare*, Case No. 30-2021-01182371-CU-OE-CXC,  
9 Honorable Randall J. Sherman, presiding (approving an hourly rate of \$750 for work performed in 2021-  
10 2023); *Robert Lewis v. IMERYS Filtration Minerals, Inc., et al.*, Case No. 22CV02874, Santa Barbara  
11 County Superior Court, Honorable Jed Beebe, presiding (approving an hourly rate of \$750 for work  
12 performed in 2021-2023); *Gerardo Sanchez v. Dutton Home Services, LLC*, Case No. 22STCV01834, Los  
13 Angeles County Superior Court, Honorable Maren E. Nelson, presiding (approving an hourly rate of \$750  
14 for work performed in 2022-2023); *Roberto Arcos, et al. v. Panoramic Doors, LLC*, Case No. 37-2021-  
15 00048823-CU-OE-CTL, San Diego County Superior Court, Honorable Loren G. Freestone, presiding  
16 (approving an hourly rate of \$850 for work performed in 2021-2023); *Olivia Rose Ramirez, et al. v.*  
17 *Wyndham Vacation Ownership, Inc.*, Case No. 20CV01715, Santa Barbara County Superior Court,  
18 Honorable James F. Rigali, presiding (approving an hourly rate of \$850 for work performed in 2020-  
19 2024); and *Aaron Hallum, et al. v. FCA US, LLC*, Case No. CIVDS1936782, San Bernardino County  
20 Superior Court, Honorable Joseph T. Ortiz, presiding (approving an hourly rate of \$850 for work  
21 performed in 2021-2024).

22 7. I have also moved to certify and have received an order certifying a class action and/or  
23 conditionally certifying a collective action in the following cases:

- 24 • *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-CXC,  
25 California Superior Court, County of Orange, Honorable Judge Gail A. Andler, presiding  
26 (certifying a class of employees who were misclassified as independent contractors);  
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- 1 • *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United States  
2 District Court, Central District of California, Honorable Judge Beverly Reid O’Connell, presiding  
3 (conditionally certifying an unpaid FLSA overtime wage class);
- 4 • *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States District  
5 Court, Central District of California, Honorable Judge John F. Walter, presiding (certifying a rest  
6 period violation class and conditionally certifying a FLSA unpaid overtime wage class);
- 7 • *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court, Northern  
8 District of California, Honorable Judge Haywood S. Gilliam, Jr., presiding (conditionally  
9 certifying an unpaid FLSA overtime wage class);
- 10 • *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States District  
11 Court, Eastern District of California, Honorable Jennifer L. Thurston, presiding (conditionally  
12 certifying an unpaid FLSA overtime wage class);
- 13 • *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC, California  
14 Superior Court, County of Orange, Honorable Judge William Claster, presiding (certifying unpaid  
15 overtime wage class and waiting time penalty class);
- 16 • *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-775372-CU-OE-CXC, California  
17 Superior Court, County of Orange, Honorable Glenda Sanders, presiding (certifying piece rate pay  
18 plan classes, expense reimbursement class, wage statement class, and waiting time penalties class);
- 19 • *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United States  
20 District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six  
21 classes of employees for rest period violations, wage statement violations, meal period violations,  
22 and overtime and double-time violations);
- 23 • *Vasquez v. Kraft Heinz Foods Company*, Case No. 16-cv-2749-WQH-BLM, United States District  
24 Court, Southern District of California, Honorable William Q. Hayes presiding (certifying classes  
25 for automatic meal period deductions, manual time deductions, late meal periods, and derivative  
26 wage statement and waiting time penalties);
- 27 • *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA, United  
28 States District Court, Northern District of California, Honorable William H. Alsup presiding



(certifying three classes of employees for unlawful wage deduction violations, wage statement violations, and waiting time violations);

- *Barbara J. Bowlin-Burdick v. Life Care Centers of America, Inc.*, Case No. BC657139, Los Angeles County Superior Court, Honorable Maren E. Nelson, presiding (certifying classes for late meal period violations, on-remises rest period violations, wage statement violations, and waiting time violations);
- *Staublein v. Wells Fargo Bank, National Association*, Case No. CIVDS1712267, San Bernardino County Superior Court, Honorable David Cohn, presiding (certifying a wage statement class);
- *Danica N. Keich, et al. v. U.S. Healthworks, Inc., et al.*, Case No. 37-2017-00015343-CU-OE-CTL, San Diego County Superior Court, Honorable Eddie C. Sturgeon, presiding (certifying classes for rest period violations, meal period violations, on-call pay violations, wage statement violations, and waiting time violations);
- *George Gomez v. The Bedrock Company*, Case No. CIVDS1824255, San Bernardino County Superior Court, Honorable David Cohn, presiding (certifying claims for unpaid overtime and minimum wage violations, meal period violations, rest period violations, wage statement violations, and waiting time penalties); and
- *Aurora Gatica v. Valley Ag, Inc. et al.*, Case No. 19CECG03018, Fresno County Superior Court, Honorable Tyler D. Tharpe, presiding (certifying claims for meal period violations, unpaid rest period violations, wage statement violations, and waiting time penalties).

8. In approximately 2018, I was selected to be a member of the Los Angeles Superior Court, Complex Civil Department Ad Hoc Wage and Hour Committee, which was chaired by the Honorable Judge Amy D. Hogue and Honorable Judge David S. Cunningham. The committee was comprised of 8 plaintiff's attorneys and 8 defense attorneys and was consulted for recommendations regarding wage and hour class action cases, including preparing model class action and PAGA action settlement agreements which are now publicly available at <http://www.lacourt.org/forms/all>.

9. In April 2019, I served as trial counsel for the Plaintiff in the matter of *Calhoun v. Aqua Tech Water Management Inc.*, Case No. BS169815, Los Angeles County Superior Court, Honorable Theresa M. Traber presiding, which was an individual wage-and-hour case that resulted in a six-figure

1 verdict in favor of Plaintiff. I was subsequently awarded attorney's fees at my requested rate of \$650 per  
2 hour in 2020.

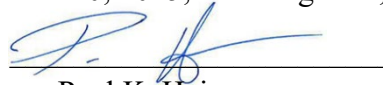
3 10. In March 2023, my firm served as trial counsel for the plaintiff and aggrieved employees  
4 in the matter of *Abraham Taduran v. James R. Glidewell, Dental Ceramics, Inc. dba Glidewell*  
5 *Laboratories*, Case No. 30-2017-00934037-CU-OE-CXC, Orange County Superior Court, Honorable  
6 William Claster presiding, which was a case brought under the Private Attorneys General Act, Labor Code  
7 §§ 2698 *et seq.*, and resulted in a six-figure verdict in favor of the aggrieved employees.

8 11. In every year from 2015 through 2017, Thomson Reuters recognized me as a Top Young  
9 Attorney in Southern California in the annual Rising Stars Edition of Super Lawyer. This is an honor  
10 awarded to no more than two-and-a-half percent of attorneys under the age of forty in Southern California  
11 each year. In every year from 2018 through 2025, Thomson Reuters recognized me as a "Super Lawyer"  
12 in the annual Super Lawyer magazine, an honor awarded to no more than five percent of all attorneys in  
13 Southern California each year.

14 12. As counsel for Plaintiff Alizadeh, I have been closely involved in all aspects of this  
15 litigation since its inception. The details of the settlement and the settlement approval process are set forth  
16 in the declaration of Kyle R. Nordrehaug, filed concurrently herewith.

17 13. I confirm that neither I nor anyone at Haines Law Group, APC is affiliated in any way with  
18 the proposed Settlement Administrator, Apex Class Action ("Apex"). I do not have any financial interest,  
19 ownership interest, or other relationship with Apex that could create a conflict of interest or call into  
20 question the neutrality of the settlement administration process.

21 I declare under penalty of perjury under the laws of California and the United States that the  
22 foregoing is true and correct. Executed on December 10, 2025, at El Segundo, California.

23   
24 Paul K. Haines