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Attorneys for Plaintiff Monique Bravo

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

MONIQUE BRAVO, an individual, on behalf
of herself and all others similarly situated,

Plaintiff,

v.

OPTUMCARE MANAGEMENT, LLC, a
California Corporation,

Defendants,

Lead Case No. 22STCV12240 ("Bravo I")
(Consolidated with Case No. 23STCV17426
("Bravo II"))

ASSIGNED FOR ALL PURPOSES TO:
Honorable Brock T. Hammond, Dept. 407

**CONSOLIDATED REPRESENTATIVE
ACTIONS**

**DECLARATION OF WALTER L. HAINES IN
SUPPORT OF PLAINTIFF'S MOTION FOR
APPROVAL OF PAGA REPRESENTATIVE
SETTLEMENT**

Date: September 10, 2026

Time: 8:30 a.m.

Dept.: 407

Reservation No.: 267317946638

Action filed: April 11, 2022

1 I, WALTER L. HAINES, declare:

2 1. I am counsel of record for Plaintiff Monique Bravo in this action. I am a member in
3 good standing of the State Bar of California. I make this Declaration in support of Plaintiff's
4 Unopposed Motion for Approval of PAGA Representative Settlement and Motion for Approval of
5 Attorneys' Fees and Costs. I make this Declaration based on my personal knowledge and if called to
6 testify I could and would competently testify to the matters contained in this Declaration.

7 2. The Settlement Agreement in this action is the result of vigorous and competent
8 representation of Plaintiff, and arms'-length, contentious negotiations with Defendant to reach the
9 best possible outcome for the Labor and Workforce Development Agency ("LWDA") and the
10 aggrieved employees. Based on my extensive experience as counsel in many class and representative
11 action settlements, I believe that the proposed Settlement is fair, reasonable, and adequate to the
12 LWDA and the aggrieved employees.

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

21 4. United Employees Law Group has prosecuted this litigation solely on a contingent-fee
22 basis and has been completely at risk that it would not receive any compensation for prosecuting
23 claims against the Defendant.

24 5. United Employees Law Group, PC, has participated in this litigation and has
25 performed work on behalf of Plaintiff since the inception of this litigation. The hours submitted with
26 this declaration are solely for work performed on behalf of the LWDA and aggrieved employees in
27 the above-titled California action and not any other state or federal matter.

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6. I performed, among other things, the following general tasks related to this matter: analyzed initial clients' claims; performed initial investigation inclusive of research necessary for case evaluation and searched court records relative to possible competing cases; consulted with co-counsel as to issues relating to the prosecution of this case; reviewed all settlement papers along with orders from the court, law and motion papers; and assisted with client liaison and other tasks assigned by lead counsel.

7. The hourly rate for my time is \$725 per hour, which is my usual and customary hourly rate charged for my services in similar class and representative action lawsuits.

8. The total number of hours spent by me on this litigation is 24.50 hours through June 1, 2026, is categorized herein below:

- Initial investigation case evaluation & court records search: 6.50 hours
- Review Pleadings, communications, and various motions: 18.00 hours

Total: 24.50 hours

9. My total lodestar amount through June 1, 2026, is: \$17,762.50.

10. I believe that the Settlement is fair, adequate, and reasonable. The Settlement provides substantial monetary benefits to the LWDA and aggrieved employees and is a product of diligent efforts to obtain the best possible result for the LWDA and aggrieved employees. This Settlement was reached following thorough legal and factual research and analysis, thorough review of data relative to the claims in the action, arduous settlement negotiations, and thorough investigation of the underlying facts by the respective parties and review of records. The settlement negotiations were, at all times, adversarial and non-collusive in nature. In sum, I am well-suited to act as counsel for Plaintiff and other aggrieved employees and will continue to vigorously represent the interests of the LWDA and the aggrieved employees.

I declare under the penalty of perjury of the laws of California that the foregoing is true and correct to the best of my knowledge.

Executed this 1st day of June 2026, in Los Angeles, California.

WALTER L. HAINES