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12 Attorneys for Plaintiff,

13 MARTHA P. BRIANO MARTINEZ, and all others similarly situated

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

15 **FOR THE COUNTY OF SONOMA**

16 **(UNLIMITED JURISDICTION)**

17
18 MARTHA P. BRIANO MARTINEZ, on behalf
19 of herself, all others similarly situated, the
20 general public, and as an “aggrieved employee”
21 on behalf of other “aggrieved employees” under
the Labor Code Private Attorneys General Act of
2004,

22 *Plaintiff(s),*

23 vs.

24 NOR CAL FOODS, LLC, a California
25 corporation; and DOES 1–50, inclusive,

26 *Defendant(s).*
27
28

Case No. SCV-270596

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
MARTHA P. BRIANO MARTINEZ’S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Dept.: 16, The Hon. Patrick
Broderick

Action filed: April 13, 2022



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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 Martha P. Briano Martinez (“Plaintiff”) in her lawsuit against
6 Defendant Nor Cal Foods, LLC (“Defendant”). I am a member in good standing of the State Bar
7 of California. I make this Declaration in support of Plaintiff’s Motion for Preliminary Approval
8 of Class Action Settlement. I make this Declaration based on my personal knowledge and if
9 called to testify I could and would competently testify to the matters contained in this
10 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 worked
14 on the litigation of this matter. I formed United Employees Law Group in 2005, primarily to
15 represent employees in their wage claims. I have represented over 1,500 clients in wage and
16 hour disputes of which more than 300 cases were class actions with settlements totaling over
17 \$400,000,000. These class action cases include Fortune 500 companies such as Pepsi, Intel,
18 Home Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co.,
19 Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

20 3. I have no conflicts of interest with the class or with the Class Representative. I
21 am not related to the representative plaintiff. I have not previously represented Defendant in any
22 matter. I do not represent opposing factions within the class in that all claims are predicated
23 upon the same theories of liability and benefit all class members equally. In sum, I am well-
24 suited to act as Class Counsel and will continue to vigorously represent the interests of the class.

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

27 Executed on Friday, September 01, 2023 at Los Angeles, California.

28 
WALTER L. HAINES,
Declarant



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