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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

JOHN LEDBETTER, ROBERT AARON,
ANTONIO SEGOVIA, JOSEPH HICKS,
WILLIAM SHEARER, DAVID LAMOUNT
GAYLES, and JOSUE BUENROSTRO on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

CJ LOGISTICS AMERICA, LLC, an Illinois
Limited Liability Company; and DOES 1-50,
inclusive,

Defendant.

Case No.: CIVSB2207118

*[Assigned for all purposes to the Hon. David
E. Driscoll, Dept. S22]*

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

Date: April 24, 2025
Time: 8:30 a.m.
Dept.: S22

Action Filed:	April 7, 2022
Removal Date:	June 10, 2022
Remand Date:	December 19, 2024
Trial Date:	None 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 co-counsel for the named Plaintiffs John Ledbetter, Robert Aaron, Antonio Segovia, Joseph Hicks, William Shearer, David Lamount Gayles, and Josue Buenrostro (collectively, “Plaintiffs”) in the above-captioned matter. 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

1 motions for decertification following class certification; conducting exposure analyses to assess
2 the strengths and weaknesses of asserted claims, the likelihood of prevailing at class certification,
3 and potential damages resulting from such claims; drafting mediation briefs; serving as the
4 primary contact to in-house counsel; deposing named plaintiffs and putative class members;
5 deposing retained expert witnesses; and defending the depositions of corporate witnesses. In
6 short, I played an integral role in all aspects of litigation from the inception of a matter through
7 and beyond class certification. I also supervised the work of several junior attorneys who were
8 staffed on the same wage and hour class actions.

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

18 6. In July 2012, I transitioned into litigating wage and hour class actions from the
19 Plaintiff’s side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since
20 February 2016 as a Shareholder of Haines Law Group, APC. Currently, over ninety percent (90%)
21 of my practice is dedicated exclusively to the prosecution of wage and hour class actions, and my
22 law firm is currently responsible for prosecuting over seventy-five (75) wage and hour class
23 actions filed in both State and Federal courts throughout California.

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

- 26 • *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-
27 CXC, California Superior Court, County of Orange, Honorable Judge Gail A. Andler,
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1 presiding (certifying a class of employees who were misclassified as independent
2 contractors);

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

(certifying classes for automatic meal period deductions, manual time deductions, late meal periods, and derivative wage statement and waiting time penalties);

- *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA, United 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. I have been appointed as Class Counsel in hundreds of wage and hour class action settlements in state and federal courts within California, and my law firm has recovered in excess of \$500 million dollars on behalf of our clients.

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1 9. In every year from 2015 through 2017, Thomson Reuters recognized me as a Top
2 Young Attorney in Southern California in the annual Rising Stars Edition of Super Lawyer. This
3 is an honor awarded to no more than two-and-a-half percent of attorneys under the age of forty in
4 Southern California each year. In every year from 2018 through 2025, Thomson Reuters
5 recognized me as a “Super Lawyer” in the annual Super Lawyer magazine, an honor awarded to
6 no more than five percent of all attorneys in Southern California each year.

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

14 11. In April 2019, I served as trial counsel for the Plaintiff in the matter of *Calhoun v.*
15 *Aqua Tech Water Management Inc.*, Case No. BS169815, Los Angeles County Superior Court,
16 Honorable Theresa M. Traber presiding, which was an individual wage-and-hour case that
17 resulted in a six-figure verdict in favor of Plaintiff. I was subsequently awarded attorney’s fees at
18 my requested rate of \$650 per hour in 2020.

19 12. In March 2023, my firm served as trial counsel for the plaintiff and the aggrieved
20 employees in the matter of *Abraham Taduran v. James R. Glidewell, Dental Ceramics, Inc. dba*
21 *Glidewell Laboratories*, Case No. 30-2017-00934037-CU-OE-CXC, Orange County Superior
22 Court, Honorable William Claster presiding, which was a case brought under the Private
23 Attorneys General Act, Labor Code §§ 2698 *et seq.*, and resulted in a six-figure verdict in favor
24 of the aggrieved employees and a six-figure statutory attorney’s fee award in which I was
25 approved at my requested rate of \$850 per hour for work performed from 2017 to 2024.

26 13. I have recently been awarded attorney’s fees following a lodestar cross-check
27 based on a rate of \$850 per hour in the following cases:
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- 1 • *Arcos v. Panoramic Doors, LLC*, Case No. 37-2021-00048823-CU-OE-CTL, San Diego
2 County Superior Court, Honorable Loren G. Freestone, presiding (using an hourly rate of
3 \$850 for work performed in 2021-2023);
- 4 • *Ramirez v. Wyndham Vacation Ownership, Inc.*, Case No. 20CV01715, Santa Barbara
5 County Superior Court, Honorable James F. Rigali, presiding (using an hourly rate of
6 \$850 for work performed from 2020-2024);
- 7 • *Aaron Hallum, et al. v. FCA US, LLC*, Case No. CIVDS1936782, San Bernardino County
8 Superior Court, Honorable Joseph T. Ortiz, presiding (using an hourly rate of \$850 for
9 work performed in 2021-2024);
- 10 • *Kevin Murphy, et al. v. Fusion Learning, Inc.*, Case No. 2:21-cv-06732-JAK (ASx),
11 United States District Court, Central District of California, Honorable John A. Kronstadt,
12 presiding (approving and finding reasonable an hourly rate of \$850 for work performed
13 in 2022-2024);
- 14 • *Target Wage and Hour Cases*, Case No. JCCP 5259, Lead Case No. CIVSB2209126, San
15 Bernardino County Superior Court, Honorable Wilfred J. Schneider, Jr., presiding (using
16 an hourly rate of \$850 for work performed in 2022-2024);
- 17 • *Karen Trudelle, et al. v. Children of the Rainbow, Inc.*, Lead Case No. 37-2022-00034860-
18 CU-OE-CTL, San Diego County Superior Court, Honorable Robert Longstreth, presiding
19 (using an hourly rate of \$850 for work performed in 2022-2024);
- 20 • *Ruben Hernandez, et al. v. Neovia Logistics Services, LLC, et al.*, Case No.
21 CIVSB2305867, San Bernardino County Superior Court, Honorable Tony Raphael,
22 presiding (using an hourly rate of \$850 for work performed in 2023-2025);
- 23 • *Jonathan Jauregui Gutierrez, et al. v. PASHA Automotive Services*, Case No. 37-2021-
24 00011967-CU-CO-CTL, San Diego County Superior Court, Honorable Katherine A.
25 Bacal, presiding (using an hourly rate of \$850 for work performed in 2021-2025); and
- 26 • *Raul Camacho, et al. v. Residential Fire Systems, Inc., et al.*, Case No. 30-2015-
27 00775372-CU-OE-CXC, Orange County Superior Court, Honorable Lon F. Hurwitz,
28 presiding (using an hourly rate of \$850 for work performed in 2015-2025).

1 14. I have recently been awarded attorney's fees following a lodestar cross-check
2 based on a rate of \$925 per hour in the following case:

- 3 • *Juan David Arreola Carrillo v. KPS Global, LLC*, Case No. 22STCV19527, Los Angeles
4 County Superior Court, Honorable Samantha Jessner, presiding (using an hourly rate of
5 \$925 for work performed in 2022-2025).

6 15. In approximately July 2022, Plaintiff Antonio Segovia retained my firm to
7 represent him in claims against Defendant CJ Logistics America, LLC ("Defendant"). On July
8 15, 2022, my office assisted Plaintiff Segovia in filing a class action lawsuit against Defendant in
9 San Bernardino County Superior Court, entitled *Antonio Segovia v. CJ Logistics America, LLC*,
10 Case No. CIVSB2215492. Shortly thereafter, my office was informed of the instant litigation
11 initiated against Defendant by Plaintiff John Ledbetter.

12 16. As counsel for Plaintiffs, I have been closely involved in all aspects of this
13 litigation since my office was first retained by Plaintiff Segovia. The details of the work
14 completed by Class Counsel in this case are set forth in the declaration of Matthew K. Moen, filed
15 concurrently herewith.

16 17. I confirm that I do not have any interest or involvement in, and am not affiliated
17 with, the proposed settlement administrator, Phoenix Settlement Administrators, or the proposed
18 *cy pres* recipient, Working Wardrobes.

19 I declare under penalty of perjury under the laws of California and the United States that
20 the foregoing is true and correct. Executed on April 2, 2025, at El Segundo, California.

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23 Paul K. Haines
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