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Attorneys for Plaintiff MOHINDERPAL DHALIWAL and all others similarly situated

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

MOHINDERPAL DHALIWAL, on behalf of himself and all others similarly situated, and the general public,

Plaintiffs,

v.

APPLIED MATERIALS, INC., a Delaware corporation; and DOES 1 through 20, inclusive,

Defendants.

Case No. 25CV466613

[Assigned for all purposes to the Hon. Charles F. Adams, Dept. 7]

DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Date: November 12, 2026
Time: 1:30 p.m.
Dept: 7

DECLARATION OF WALTER L. HAINES

I, Walter L. Haines, declare:

1. I am an attorney licensed to practice before all courts of the State of California and am attorney of record for the Plaintiff herein. I have personal knowledge of the facts herein. I am a member in good standing of the State Bar of California.

2. I make this Declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement. I make this Declaration based on my personal knowledge and if called to testify I could and would competently testify to the matters contained in this Declaration.

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

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

5. I have no conflicts of interest with the class or with the Class Representative. I am not related to the representative plaintiff. I have not previously represented Defendant in any matter. I do not represent opposing factions within the class in that all claims are predicated upon the same theories of liability and benefit all class members equally.

6. In sum, I am well-suited to act as Class Counsel and will continue to vigorously represent the interests of the class.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Executed on April 9, 2026, at Los Angeles, California.



WALTER L. HAINES