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8 Attorneys for Plaintiff,
TOJYIA GREEN, and all others similarly situated

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF ORANGE**
11 **(UNLIMITED JURISDICTION)**
12

13 TOJYIA GREEN, on behalf of herself, all others
14 similarly situated, the general public, and as an
“aggrieved employee” on behalf of other
15 “aggrieved employees” under the Labor Code
Private Attorneys General Act of 2004,

16 *Plaintiff(s),*

17 vs.
18

19 MAGNUM MANAGEMENT
CORPORATION, an Ohio corporation; CEDAR
20 FAIR, L.P., a Delaware limited partnership; and
DOES 1–50, inclusive,
21

22 *Defendant(s).*
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Case No. 30-2022-01276962-CU-OE-CXC

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
TOJYIA GREEN’S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**



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TOJYIA GREEN, and all others similarly situated



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1 **DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR**
2 **PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**
3

4 I, WALTER L. HAINES, declare as follows:

5 1. I am an attorney duly licensed to practice law in the State of California and am an
6 attorney of record for Plaintiff Tojyia Green (“Plaintiff”) in her lawsuit against Defendants
7 Magnum Management Corporation and Cedar Fair, L.P. (“Defendants”). I am a member in good
8 standing of the State Bar of California. I make this Declaration in support of Plaintiff’s Motion
9 for Preliminary Approval of Class Action Settlement. I make this Declaration based on my
10 personal knowledge and if called to testify I could and would competently testify to the matters
11 contained in this Declaration.
12

13 2. I am a highly experienced class action attorney, with over 40 years of practice that
14 includes extensive involvement in matters of this nature. I am the most senior attorney at my firm,
15 United Employees Law Group, and worked on the litigation of this matter. I formed United
16 Employees Law Group in 2005, primarily to represent employees in their wage claims. I have
17 represented over 1,500 clients in wage and hour disputes of which more than 300 cases were class
18 actions with settlements totaling over \$400,000,000. These class action cases include Fortune 500
19 companies such as Pepsi, Intel, Home Depot, Kaiser, Wells Fargo, Bank of America, Cisco
20 Systems, First American Title Co., Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser
21 Foundation Hospitals.
22

23 3. I have no conflicts of interest with the class or with the Class Representative. I am
24 not related to the representative plaintiff. I have not previously represented Defendants in any
25 matter. I do not represent opposing factions within the class in that all claims are predicated upon
26 the same theories of liability and benefit all class members equally. In sum, I am well-suited to
27 act as Class Counsel and will continue to vigorously represent the interests of the class.
28

 4. I am not aware of any class, representative, or other collective action in any
other court, in this, or any other jurisdiction, that asserts claims similar to those asserted in



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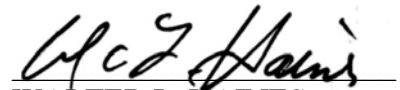
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1 this action, on behalf of the class or group of individuals, some or all of whom would also be
2 members of the class to find in this action. I have made a reasonable inquiry of the other
3 members of my law firm to determine whether they are aware of any such similar actions.
4 Based on these inquiries, I am aware of no such similar actions.

5 I declare under the penalty of perjury of the laws of the State of California that the
6 foregoing is true and correct.

7 Executed on Friday, April 18, 2025 at Los Angeles, California.

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9 
10 WALTER L. HAINES,
11 Declarant
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