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17 Attorneys for Plaintiff,
18 CARLOS SIMON, and all others similarly situated

19 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

20 **FOR THE COUNTY OF SAN MATEO**
21 **(UNLIMITED JURISDICTION)**

22 CARLOS SIMON, on behalf of himself, and
23 all others similarly situated, and as an
24 “aggrieved employee” on behalf of other
25 “aggrieved employees” under the Labor Code
26 Private Attorneys General Act of 2004,

27 *Plaintiff(s),*

28 vs.

AIRPORT VAN RENTAL, INC., a California
corporation; YAZDAN IRANI, a natural
person; and DOES 1 through 50, inclusive,

Defendant(s).

Case No.: CIV536624

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

Action filed: December 2, 2015
Hearing Date: December 27, 2017
Hearing Time: 1:30 p.m.
Hearing Dept.: 2, Hon. Marie S. Weiner

DECLARATION OF WALTER L. HAINES

I, Walter L. Haines, declare:

1. I am counsel of record for Plaintiff Carlos Simon (hereafter referred to as “Plaintiff” or “Simon”) in this action against Defendants Airport Van Rental, Inc. and Yazdan Irani (“Defendants”). I am a member in good standing of the State Bar of California. 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.

2. I am a highly experienced class action counsel specializing in in actions of this nature. I have been practicing law for over 39 years and I am highly experienced in actions of this nature. I am the most senior attorney in 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 380 cases were class actions with settlements totaling over \$530,000,000. 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.

3. I have no conflicts of interest with the class or with the Class Representative. I am not related to any representative Plaintiff. I have not previously represented Defendants 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. 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 the United States and California that the foregoing is true and correct.

Executed this 28TH day of November, 2017 at Los Angeles, California.



WALTER L. HAINES,
Declarant

1 PROOF OF SERVICE

2 State of California,
3 County of Los Angeles

4 1. I am a citizen of the United States and am employed in the County
5 of Los Angeles, State of California. I am over the age of 18 years, and not a
6 party to the within action. My business address is 16530 Ventura Blvd., Suite
7 312, Encino, California 91436.

8 2. I am familiar with the practice of The Spivak Law Firm, for
9 collection and processing of correspondence for mailing with the United
10 States Postal Service. It is the practice that correspondence is deposited
11 with the United States Postal Service the same day it is submitted for
12 mailing.

13 On Monday, December 04, 2017, I served the foregoing document described
14 as **DECLARATION OF WALTER L. HAINES IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION**
15 **FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** on interested parties by
16 placing a true and correct copy thereof enclosed in a sealed envelope, with
17 postage fully prepaid, addressed as follows:

18 Joel Perry Glaser, Esq.
19 Gillian Mellon, Esq.
20 JOEL GLASER APC
21 11300 W. Olympic Blvd., Suite 910
22 Los Angeles, CA 90064
23 joel@glaserlaw.org
24 gillian@glaserlaw.org

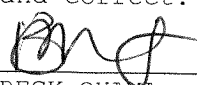
25 XXXX (BY OVERNIGHT DELIVERY) I enclosed the documents in an envelope or
26 package provided by an overnight delivery carrier and addressed to the
27 persons at the addresses above. I placed the envelope or package for
28 collection and overnight delivery at an office or a regularly utilized drop
box of the overnight delivery carrier.

Hon. Marie Weiner, Department 2
San Mateo Superior Court
Courtroom 2E
400 County Center
Redwood City, CA 94063
complexcivil@sanmateocourt.org

XXXX (BY EMAIL) Based on a court order, I caused the documents to be sent to
the persons at the electronic service addresses listed above from my
electronic service address breck@spivaklaw.com or boyama@spivaklaw.com.

EXECUTED on Monday, December 04, 2017, at Encino, California.

XXXX (State) I declare under penalty of perjury under the laws of the State
of California that the above is true and correct.


BRECK OYAMA