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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

ENERSAIN BELTRAN, as an individual and on behalf of all others similarly situated,

Plaintiff,

vs.

THE ROOF MASTERS, INC., a California corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 25CU021086C

[*Assigned for all purposes to the Hon. Gregory W. Pollack, Dept. C-71*]

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

Date: November 6, 2026
Time: 9:30 a.m.
Dept.: C-71

Action Filed: April 23, 2025
Trial Date: None Set

DECLARATION OF PAUL K. HAINES

I, Paul K. Haines, declare as follows:

1. I am a shareholder and principal of the law firm Haines Law Group, APC and counsel for the named plaintiff Enersain Beltran ("Plaintiff") 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 motions for decertification following class certification; conducting exposure analyses

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

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

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

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

- *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge Gail A. Andler,

presiding (certifying a class of employees who were misclassified as independent contractors);

- *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United States District Court, Central District of California, Honorable Judge Beverly Reid O'Connell, presiding (conditionally certifying an unpaid FLSA overtime wage class);
- *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States District Court, Central District of California, Honorable Judge John F. Walter, presiding (certifying a rest period violation class and conditionally certifying a FLSA unpaid overtime wage class);
- *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court, Northern District of California, Honorable Judge Haywood S. Gilliam, Jr., presiding (conditionally certifying an unpaid FLSA overtime wage class);
- *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States District Court, Eastern District of California, Honorable Jennifer L. Thurston, presiding (conditionally certifying an unpaid FLSA overtime wage class);
- *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge William Claster, presiding (certifying unpaid overtime wage class and waiting time penalty class);
- *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-00775372-CU-OE-CXC, California Superior Court, County of Orange, Honorable Glenda Sanders, presiding (certifying piece rate pay plan classes, expense reimbursement class, wage statement class, and waiting time penalties class);
- *Ontiveros v. Safelite Fulfillment, Inc., et al,* Case No. CV 15-7118-DMG (RAOx), United States District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six classes of employees for rest period violations, wage statement violations, meal period violations, and overtime and double-time violations);
- *Vasquez v. Kraft Heinz Foods Company,* Case No. 16-cv-2749-WQH-BLM, United States 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);
- *Francisco Perez v. Sunbelt Rentals, Inc.*, Case No. 37-2018-00026405-CU-OE-CTL, San Diego County Superior Court, Honorable Eddie C. Sturgeon, presiding (certifying a wage statement class);
- *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-premises 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);
- *Quentin McDonald, et al. v. Sierra Pacific Industries*, Case No. 191133, Shasta County Superior Court, Honorable Tamara L. Wood, presiding (certifying classes for rest period violations, meal period violations, unpaid overtime and minimum wage violations, expense reimbursement violations, wage statement violations, and waiting time penalties);
- *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);

- *Aurora Gatica v. Valley Ag, Inc. et al.*, Case No. 19CECG03018, Fresno County Superior Court, Honorable D. Tyler Tharpe, presiding (certifying claims for meal period violations, unpaid rest period violations, wage statement violations, and waiting time penalties);
- *Ortencia Soto v. Puretek Corporation*, Case No. 21STCV28904, Los Angeles County Superior Court, Honorable Lawrence P. Riff, presiding (certifying claims for meal period violations, rest period violations, waiting time penalties, and wage statement violations); and
- *Quincy Calloway, et al. v. Lightstorm Entertainment, Inc., et al.*, Case No. 24STCV05939, Los Angeles County Superior Court, Honorable Theresa Traber, presiding (certifying claims for unpaid overtime wage 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.

9. In 2025, I was awarded attorney's fees following a lodestar cross-check based on a rate of $925 per hour in the following cases:

- *Juan David Arreola Carrillo v. KPS Global, LLC*, Case No. 22STCV19527, Los Angeles County Superior Court, Honorable Samantha Jessner, presiding (using an hourly rate of $925 for work performed in 2022-2025);
- *In Re: Stanislaus Food Products Company Employment Cases*, Lead Case No. CV-23-001433, Stanislaus County Superior Court, Honorable John D. Freeland, presiding (using an hourly rate of $925 for work performed in 2023-2025);
- *Joseph Jones v. Chandler Aggregates, Inc.*, Case No. CVRI2204692, Riverside County Superior Court, Honorable Harold W. Hopp, presiding (using an hourly rate of $925 for work performed in 2022-2025);

- *Samantha Vvanti, et al. v. O'Reilly Auto Enterprises, LLC*, Case No. 19STCV00091, Los Angeles County Superior Court, Honorable Timothy Patrick Dillon, presiding (using an hourly rate of $925 for work performed in 2022-2025);
- *Elia Paredes Acosta v. SMG/Long Beach Convention and Entertainment Center, et al.*, Case No. 21STCV27103, Los Angeles County Superior Court, Honorable Theresa M. Traber, presiding (using an hourly rate of $925 for work performed in 2021-2025);
- *John Ledbetter, et al. v. CJ Logistics America, LLC*, Case No. CIVSB2207118, San Bernardino County Superior Court, Honorable David E. Driscoll, presiding (using an hourly rate of $925 for work performed in 2022-2025).

10. So far in 2026, I have been awarded attorney's fees following a lodestar cross-check based on hourly rates of $925 and $975 per hour in the following cases:

- *Alfonso Almaraz v. World Oil Corp.,* Case No. 23STCV18296, Los Angeles County Superior Court, Honorable David S. Cunningham III, presiding (using an hourly rate of $925 for work performed in 2023-2026);
- *Ada Mendoza v. Desert Valley Date LLC*, Case No. CVRI2301048, Riverside County Superior Court, Honorable Harold W. Hopp, presiding (awarding attorney's fees following a lodestar cross-check based on an hourly rate of $925 for work performed in 2023-2026);
- *Angel Sanchez v. Ickler Electric Corporation*, Case No. 37-2024-00017621-CU-OE-CTL, San Diego County Superior Court, Honorable Joel R. Wohlfeil, presiding (using an hourly rate of $975 for work performed in 2024-2026);
- *Vicente Sandoval v. Cybex Security Solutions, LLC, et al.*, Case No. 30-2024-01398109-CU-OE-CXC, Orange County Superior Court, Honorable Layne H. Melzer, presiding (using an hourly rate of $975 for work performed in 2024-2026);
- *Falcao Rivelino Hernandez, et al. v. LDI Mechanical, Inc.*, Case No. CVRI2401542, Riverside County Superior Court, Honorable Harold W. Hopp, presiding (using an hourly rate of $975 for work performed in 2024-2026);

- *Jose Fuentes v. Southwest Material Handling, Inc.*, Case No. CVRI2404365, Riverside County Superior Court, Honorable Harold W. Hopp, presiding (using an hourly rate of $975 for work performed in 2024-2026);
- *Brianna McCulin, et al. v. South Coast Children's Society, Inc.*, Case No. 25STCV09319, Los Angeles County Superior Court, Honorable Elaine Lu, presiding (using an hourly rate of $975 for work performed in 2025-2026);
- *Jose Moran vs. Araca Merchandise, L.P., et al.*, Case No. 24STCV02003, Los Angeles County Superior Court, Honorable William F. Highberger, presiding (using an hourly rate of $975 for work performed in 2024-2026);
- *Jose Vasquez v. Santa Clarita Valley Committee on Aging Corporation, dba SCV Senior Center*, Case No. 25STCV06096, Los Angeles County Superior Court, Honorable Laura A. Seigle, presiding (using an hourly rate of $975 for work performed in 2025-2026);
- *Darren Cain v. Bellhops Moving, LLC*, Case No. 24STCV09965, Los Angeles County Superior Court, Honorable Theresa M. Traber, presiding (using an hourly rate of $975 for work performed in 2024-2026); and
- *George Gomez v. The Bedrock Company*, Case No. CIVDS1824255, San Bernardino County Superior Court, Honorable Kevin C. Lee, presiding (using an hourly rate of $975 for work performed in 2018-2026).

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

12. In April 2019, I served as trial counsel for the Plaintiff in the matter of *Calhoun v. Aqua Tech Water Management Inc.*, Case No. BS169815, Los Angeles County Superior Court,

Honorable Theresa M. Traber presiding, which was an individual wage-and-hour case that resulted in a six-figure verdict in favor of Plaintiff. I was subsequently awarded attorney's fees at my requested rate of $650 per hour in 2020.

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

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

15. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation since its inception. The details of the work completed by Class Counsel in this case are set forth in the declaration of Matthew K. Moen, filed concurrently herewith.

16. I confirm that I do not have any interest or involvement in, and am not affiliated with, the proposed settlement administrator, Apex Class Action Administration, or the proposed *cy pres* recipient, Legal Aid at Work.

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17. I am not aware of any other class, representative, or other collective actions in any other court or jurisdiction that assert claims similar to those asserted in this action on behalf of a class or group of individuals some or all of whom would also be members of the class defined in this action.

I declare under penalty of perjury under the laws of California and the United States that the foregoing is true and correct. Executed on October 13, 2026, at El Segundo, California.



Paul K. Haines