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Attorneys for Plaintiff Michael Bolds,
on behalf of himself and all others similarly situated

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN BERNARDINO

MICHAEL BOLDS, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

TRANSPORTUS INC., a California
Corporation; and DOES 1 Through 10,
inclusive,

Defendant.

Case No. CIVSB2515019

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Donald Alvarez
Department S23

CLASS ACTION

**DECLARATION OF WALTER L. HAINES
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE ACTION
SETTLEMENT**

Date: June 11, 2026

Time: 9:00 a.m.

Dept.: S23

Complaint filed: May 27, 2025

Trial date: Not Set

1 I, Walter L. Haines, declare:

2 1. I am an attorney licensed to practice before all courts of the State of California. I
3 am counsel of record for Plaintiff Michael Bolds in this action. I make this declaration in support
4 of Plaintiff's Motion for Preliminary Approval of Class and Representative Action Settlement. I
5 make this declaration based on my personal knowledge, and if called to testify, I could and would
6 competently testify to the matters contained in this declaration.

7 2. The Settlement Agreement in this action is the result of vigorous and competent
8 representation of Plaintiff, and arms'-length, contentious negotiations with Defendant to reach
9 the best possible outcome for Class Members and aggrieved employees. Based on my experience
10 as Class Counsel, I believe that the proposed Settlement is fair, reasonable, and adequate for the
11 class and aggrieved employees.

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

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

24 5. I have no conflicts of interest with the Class Members/aggrieved employees in this
25 action. I am not related to the named Plaintiff. I have not previously represented Defendant in any
26 matter.

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I declare under the penalty of perjury of the laws of California that the foregoing is true and correct to the best of my knowledge.

W. C. G. Harris

Walter L. Haines