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9 Attorneys for Plaintiff(s),

10 AMBER ASHLEY DAMAS, and all others similarly situated

11 (Additional attorneys for Plaintiff(s) on following page)

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **FOR THE COUNTY OF SAN JOAQUIN**

14 **(UNLIMITED JURISDICTION)**

15 AMBER ASHLEY DAMAS, on behalf of
16 herself and as an “aggrieved employee” on behalf
17 of other “aggrieved employees” under the Labor
18 Code Private Attorneys General Act of 2004,

19 *Plaintiff,*

20 vs.

21 JUST WINGIN' IT, INC., a California
22 corporation; and DOES 1–50, inclusive,

23 *Defendants.*

Case No. STK-CV-UOE-2022-0007989

24 **DECLARATION OF WALTER L.**
25 **HAINES IN SUPPORT OF PLAINTIFF**
26 **AMBER ASHLEY DAMAS’ MOTION**
27 **FOR APPROVAL OF PAGA**
28 **SETTLEMENT**



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1 **DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR**
2 **APPROVAL OF PAGA SETTLEMENT**

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

4 1. I am an attorney duly licensed to practice law in the State of California and am
5 an attorney of record for Plaintiff Amber Ashley Damas (“Plaintiff”) in her lawsuit against
6 Defendant Just Wingin’ It, Inc. (“Defendant”). I am a member in good standing of the State Bar
7 of California. I make this Declaration in support of Plaintiff’s Motion for Approval of PAGA
8 Settlement. I make this Declaration based on my personal knowledge and if called to testify I
9 could and would competently testify to the matters contained in this Declaration.

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

19 3. I have no conflicts of interest with the Aggrieved Employees or with the Plaintiff.
20 I am not related to the representative plaintiff. I have not previously represented Defendant in
21 any matter. I do not represent opposing factions within the Aggrieved Employees in that all
22 claims are predicated upon the same theories of liability and benefit all Aggrieved Employees
23 equally. In sum, I am well-suited to act as PAGA Counsel and will continue to vigorously
24 represent the interests of the Aggrieved Employees.

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

28 5. United Employees Law Group has participated in this litigation and has
performed work on behalf of Plaintiff Amber Ashley Damas since the inception of this litigation.
The hours submitted with this declaration are solely for work performed on behalf of the
Aggrieved Employees alleged in the above-entitled California action and not any other state or



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1 federal matter.

2 6. I performed, among other things, the following tasks related to this matter:
3 analyzed initial clients' claims; performed initial investigation inclusive of research necessary
4 for case evaluation and searched court records relative to possible competing cases. I consulted
5 with co-counsel as to issues relating to the prosecution of this case, participated in its settlement
6 and reviewed all settlement papers along with orders from the court, and assisted with client
liaison and other tasks assigned by lead counsel.

7 7. The hourly rate for my time is \$725.00 per hour which is my usual and customary
8 hourly rate charged for my services in similar complex class and representative actions.

9 8. The total number of hours spent by me on this litigation is 30.70 hours through
10 November 25, 2024.

11 9. My total lodestar amount through November 25, 2024, is \$22,257.50.

12 10. No charges have been included for paralegal or staff time spent on this matter.

13 11. My out-of-pocket expenses for postage are \$1.08. Total out of pocket expenses
14 are \$1.08.

15 12. I believe that the Settlement is fair, adequate, and reasonable. The Settlement
16 provides substantial monetary benefits to the Aggrieved Employees and is a product of diligent
17 efforts of Plaintiff's Counsel to obtain the best possible result for the Aggrieved Employees.
18 This Settlement was reached following thorough legal and factual research and analysis,
19 thorough review of extensive data relative to the claims in the action, arduous settlement
20 negotiations, and thorough investigation of the underlying facts by the respective parties and
21 review of records. The settlement negotiations were, at all times, adversarial and non-collusive
22 in nature. The proposed Settlement is within the range of reasonableness, and the Aggrieved
Employees have supported the Settlement.

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

25 Executed on Monday, November 25, 2024 at West Hollywood, California.

26 
27 WALTER L. HAINES,
28 Declarant



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