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Attorneys for Plaintiff PHILLIP TING and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

PHILLIP TING, an individual; on behalf of
himself and all others similarly situated and
the general public,

Plaintiffs,

v.

INPRODUCTION, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendants.

) Case No. 22STCV34682

) [Assigned for All Purposes to:
) The Hon. Elihu M. Berle, Dept. 6]

) **DECLARATION OF WALTER L. HAINES**
) **IN SUPPORT OF MOTION FOR FINAL**
) **APPROVAL OF CLASS ACTION**
) **SETTLEMENT**

) Date: April 3, 2025

) Time: 10:00 a.m.

) Dept: 6

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DECLARATION OF WALTER L. HAINES

I, Walter L. Haines, declare:

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for the Plaintiffs herein. I am a member in good standing of the State Bar of California.

2. I make this Declaration in support of Plaintiffs' Motion for Final 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.

3. I am a highly experienced class action counsel specializing in in actions of this nature. I have been practicing law for over 40 years and I am highly experienced in actions of this nature. I am the most senior attorney at 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 300 cases were class actions with settlements totaling over \$400,000,000. 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.

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

5. United Employees Law Group has participated in this litigation and has performed work on behalf of Plaintiffs since the inception of this litigation. The hours submitted with this declaration are solely for work performed on behalf of the class alleged in the above-entitled California action and not any other state or federal matter.

6. I performed, among other things, the following tasks related to this matter: analyzed initial clients' claims; performed initial investigation inclusive of research necessary for case evaluation and searched court records relative to possible competing cases. I consulted with

co-counsel as to issues relating to the prosecution of this case, participated in its mediation and settlement and reviewed all settlement papers along with orders from the court, law and motion papers and assisted with client liaison and other tasks assigned by lead counsel.

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

8. The total number of hours spent by me on this litigation is 19.50 hours through January 31, 2025. The hours billed are broken down as follows:

Intake and client signup: 6.00

Review documents: 6.50

Review and edit MOU, settlement agreement and prelim approval: 5.80

Oversee admin and review and edit final approval: 1.20

Total Hours = 19.50

9. My involvement with the case was primarily in the very initial stages of vetting the potential client, along with verification that there were no conflicting cases existing at that time. During most of the litigation there were ongoing communications with co-counsel discussing strategy and status of litigation.

10. My total lodestar amount through January 31, 2025 is \$14,137.50 (19.50 hours @ \$725/hour).

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

12. My out of pocket expenses for Case Anywhere fees are \$1,070.55. My out of pocket expenses for postage are \$2.28. Total out of pocket expenses are \$1,072.83.

13. I believe that the Settlement is fair, adequate, and reasonable. The Settlement provides substantial monetary benefits to Class Members and is a product of diligent efforts of Class Counsel to obtain the best possible result for the Class Members. This Settlement was reached following thorough legal and factual research and analysis, thorough review of extensive data relative to the claims in the action, arduous settlement negotiations, and thorough

1 investigation of the underlying facts by the respective parties and review of records. The
2 settlement negotiations were, at all times, adversarial and non-collusive in nature. The proposed
3 Settlement is within the range of reasonableness, and Class Members have supported the
4 Settlement.

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

7 Executed this 31st day of January, 2025 at Los Angeles, California.

8 
9 _____
10 Walter L. Haines