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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,

vs.

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**
) **PRELIMINARY APPROVAL OF CLASS**
) **ACTION SETTLEMENT**

) Date: March 7, 2024

) Time: 9:00 a.m.

) Dept: 6

DECLARATION OF WALTER L. HAINES

I, Aaron A. Bartz, declare:

1. I am an attorney licensed to practice before all courts of the State of California. I am the owner of United Employees Law Group, PC, and am Class Counsel for the Plaintiffs herein. I have personal knowledge of the facts herein. If called as a witness, I could and would competently testify to those facts under oath.

2. This declaration is submitted in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement in the above-entitled matter.

3. I have been practicing law for over 40 years and I am highly experienced in actions of this nature. I am the principal attorney at 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 were class actions with settlements totaling over \$400,000,000. These class action cases included 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 Defendants.

5. I have no conflicts of interest with the class or with the class representatives. I am not related to the representative Plaintiffs. 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.

6. In sum, I am well-suited to act as Class Counsel and will continue to vigorously represent the interests of the class.

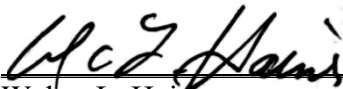
7. Based on my experience, I believe that the proposed settlement is fair, adequate and reasonable, as well as in the best interest of the settlement class members.

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1 I declare under penalty of perjury of the laws of California and of the United States of
2 America that the foregoing is true and correct. Executed this 16th day of January, 2024, at Los
3 Angeles, California.

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6 Walter L. Haines
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