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8 JUSTIN LOPEZ, and all others similarly situated

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF LOS ANGELES**

11 **(UNLIMITED JURISDICTION)**

12
13 JUSTIN LOPEZ, on behalf of himself, all others
14 similarly situated, the general public, and as an
15 “aggrieved employee” on behalf of other
16 “aggrieved employees” under the Labor Code
17 Private Attorneys General Act of 2004,

18 *Plaintiff(s),*

19 vs.

20 EDWARD WALTER SUNSERI, a natural
21 person doing business as Sunseri’s Bar and
22 Beverage Catering; MICHAEL SERENO, a
23 natural person; and DOES 1–50, inclusive,

24 *Defendant(s).*

Case No. 22STCV37939

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
JUSTIN LOPEZ’S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: October 17, 2024

Hearing Time: 2:00 p.m.

Hearing Dept.: Dept. 14, The Honorable
Kenneth R. Freeman

Action filed: December 05, 2022

Trial Date: Not Set



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1 **DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR**
2 **PRELIMINARY APPROVAL OF CLASS ACTION 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 an
5 attorney of record for Plaintiff Justin Lopez (“Plaintiff”) in his lawsuit against Defendants Edward
6 Walter Sunseri and Michael Sereno (collectively “Defendants”). I am a member in good standing
7 of the State Bar of California. I make this Declaration in support of Plaintiff’s Motion for
8 Preliminary Approval of Class Action Settlement. I make this Declaration based on my personal
9 knowledge and if called to testify I could and would competently testify to the matters contained
10 in this Declaration.

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

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

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