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Attorneys for Plaintiff CHRISS SORENSEN, on behalf of himself and other aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

CHRISS SORENSEN, on behalf of himself
and other aggrieved employees

Plaintiff,

v.

P.F. AUTOMOTIVE, LLC, a California
limited liability company; and DOES 1
through 100, inclusive,

Defendants.

) CASE NO. 37-2023-00025169-CU-OE-CTL

)

) [Assigned for all purposes to the Hon. Joel R.
Wohlfeil, Dept. C-73]

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) **RESERVATION ID. 3075449**

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) **DECLARATION OF WALTER L.
HAINES IN SUPPORT OF MOTION TO
APPROVE PAGA SETTLEMENT**

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) Date: March 15, 2024

) Time: 9:00 a.m.

) Dept.: C-73

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1 with this declaration are solely for work performed on behalf of the PAGA Members alleged in
2 the above-entitled California action and not any other state or federal matter.

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

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

10 8. The total number of hours spent by me on this litigation is 9.10 hours through
11 January 12, 2024.

12 9. My total lodestar amount through January 12, 2024 is \$6,597.50.

13 10. My out-of-pocket expenses for postage is \$1.14. My firm's total out-of-pocket
14 expenses are \$1.14.

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

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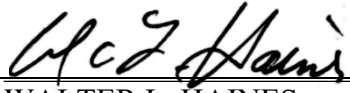
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1 I declare under the penalty of perjury of the laws of the State of California that the
2 foregoing is true and correct to the best of my knowledge.

3 Executed on Sunday, January 14, 2024 at Los Angeles, California.

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5 WALTER L. HAINES,
6 Declarant