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9 Attorneys for Plaintiff,

10 VICKIE WILLIAMS, and all others similarly situated

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **FOR THE COUNTY OF SOLANO**

13 **(UNLIMITED JURISDICTION)**

14 VICKIE WILLIAMS, on behalf of herself, all
15 others similarly situated, the general public, and
16 as an “aggrieved employee” on behalf of other
17 “aggrieved employees” under the Labor Code
18 Private Attorneys General Act of 2004,

19 *Plaintiff(s),*

20 vs.

21 VALLEJO HOSPITALITY LLC, California
22 limited liability company; THREE65
23 HOSPITALITY LLC, a California limited
24 liability company; and DOES 1–50, inclusive,

25 *Defendant(s).*

Case No. FCS059352

26 **DECLARATION OF WALTER L.
27 HAINES IN SUPPORT OF PLAINTIFF
28 VICKIE WILLIAMS’S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**



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

I, WALTER L. HAINES, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for Plaintiff Vickie Williams (“Plaintiff”) in her lawsuit against Defendant Vallejo Hospitality LLC (“Defendant”). I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiff’s Motion for Preliminary 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.

2. I am a highly experienced class action attorney, with over 40 years of practice that includes extensive involvement in matters 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.

3. I have no conflicts of interest with the class or with the Class Representative. I am not related to the representative plaintiff. I have not previously represented Defendant 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. In sum, I am well-suited to act as Class Counsel and will continue to vigorously represent the interests of the class.

4. I am not aware of any class, representative, or other collective action in any other court, in this, or any other jurisdiction, that asserts claims similar to those asserted in this action, on behalf of the class or group of individuals, some or all of whom would also be members of the class to find in this action. I have made a reasonable inquiry of the other members of my law firm to determine whether they are aware of any such similar actions.



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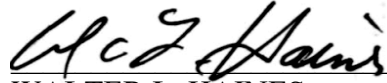
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1 Based on these inquiries, I am aware of no such similar actions.

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

4 Executed on Monday, July 20, 2026 at Los Angeles, California.

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6 WALTER L. HAINES,
7 Declarant
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