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7 Attorneys for Plaintiff,

8 JAVIER ARRAZOLA, and all others similarly situated

9 (Additional attorneys for Plaintiff(s) on following page)

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF LOS ANGELES**

12 **(UNLIMITED JURISDICTION)**

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

17 *Plaintiff(s),*

18 vs.

19 IRRIGATION EXPRESS, INC., a California
20 corporation, IRRIGATION EXPRESS AND
21 SIMPLE TURF, a California corporation;
YOSEF AMZALAG SUPPLY, a California
22 corporation; YOSEF AMZALAG, a natural
23 person; and DOES 1–50, inclusive,

24 *Defendant(s).*

Case No. 25STCV25534

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

Hearing Date: September 16, 2026

Hearing Time: 10:00 a.m.

Hearing Dept.: SSC-15, The Honorable
Timothy P. Dillon

Action filed: August 29, 2025



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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 Javier Arrazola (“Plaintiff”) in his lawsuit against Defendants
6 Irrigation Express And Simple Turf (“Defendant”). I am a member in good standing of the State
7 Bar of California. I make this Declaration in support of Plaintiff’s Motion for Preliminary
8 Approval of Class Action Settlement. I make this Declaration based on my personal knowledge
9 and if called to testify I could and would competently testify to the matters contained in this
10 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 represent
15 employees in their wage claims. I have represented over 1,500 clients in wage and hour disputes
16 of which more than 300 cases were class actions with settlements totaling over \$400,000,000.
17 These class action cases include Fortune 500 companies such as Pepsi, Intel, Home Depot, Kaiser,
18 Wells Fargo, Bank of America, Cisco Systems, First American Title Co., Yahoo!, WellPoint, Inc.,
19 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.

25 4. I am not aware of any class, representative, or other collective action in any
26 other court, in this, or any other jurisdiction, that asserts claims similar to those asserted in
27 this action, on behalf of the class or group of individuals, some or all of whom would also be
28 members of the class defined in this action. I have made a reasonable inquiry of the other



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1 members of my law firm to determine whether they are aware of any such similar actions.
2 Based on these inquiries, I am aware of no such similar actions.

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

5 Executed on Tuesday, August 04, 2026 at Los Angeles, California.

6 
7 WALTER L. HAINES,
8 Declarant
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