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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MARGARITA RAMIREZ, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

BEVPACK INC., a California corporation; and
DOES 1 through 100, inclusive.

Defendants.

Case No.: 25STCV19167

*[Assigned for all purposes to the Hon. Elaine Lu
Dept. 9]*

**DECLARATION OF IAN T. MALLERY IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: October 13, 2026
Time: 8:30 a.m.
Dept.: 9

Action Filed: July 1, 2025
Trial Date: Not Set

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I, IAN T. MALLERY, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Margarita Ramirez (“Plaintiff”) in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I received a Bachelor of Arts from Washington University in St. Louis in 2021, and a Juris Doctor from the University of Minnesota Law School in 2024. I was admitted to the California State Bar in December 2024.

3. During law school, I served as Student Director of the University of Minnesota Clemency Project Clinic and was selected as a Human Rights Fellow with the University of Minnesota Human Rights Center.

4. Prior to and during law school I interned and clerked for the American Civil Liberties Union of Missouri, where I worked on individual and class action civil rights litigation cases, including drafting complaints, memoranda, and briefs on substantive litigation issues. I also participated in a year-long internship with the National Labor Relations Board – Region 18, where I investigated unfair labor practices charges, negotiated settlements, drafted memoranda, and issued complaints on behalf of the General Counsel. Since September 2024, I have worked at Haines Law Group, APC, first as a law clerk then as an associate attorney once I was admitted to the California State Bar in December 2024.

5. Although non-exhaustive, the types of tasks I have performed include: conducting client intakes, drafting complaints, attending court hearings in state and federal courts, corresponding with opposing counsel, drafting and responding to written discovery, taking PMQ depositions, drafting and opposing a variety of motions including motions to compel discovery and motions for summary judgment, drafting mediation briefs, attending mandatory settlement

1 conferences, drafting long-form settlement agreements, and drafting motions for preliminary and
2 final settlement approval.

3 6. The following is a non-exhaustive list of the class action settlements in which I
4 played a major role assisting Class Counsel, and which have been granted final approval: *Raul*
5 *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-00775372-CU-OE-CXC, Orange
6 County Superior Court; *Ruben Hernandez v. Neovia Logistics Services, LLC*, Case No.
7 CIVSB2305867, San Bernardino County Superior Court; *Juan David Arreola Carrillo v. KPS*
8 *Global, LLC*, Case No. 22STCV19527, Los Angeles County Superior Court; *Eric Prado v.*
9 *Wilwood Engineering*, Case No. 2023CUOE015773, Ventura County Superior Court; *Alfonso*
10 *Almaraz v. World Oil Corp.*, Case No. 23STCV18296, Los Angeles County Superior Court; *Angel*
11 *Sanchez v. Ickler Electric Corporation*, Case No. 37-2024-00017621-CU-OE-CTL, San Diego
12 County Superior Court; *John Ledbetter, et al. v. CJ Logistics America, LLC*, Case No.
13 CIVSB2207118, San Bernardino County Superior Court.

14 7. I have been named as Class Counsel and awarded attorney's fees following a
15 lodestar cross-check in the following cases:

- 16 • *Vicente Sandoval v. Cybex Security Solutions, LLC, et al.*, Case No. 30-2024-
17 01398109-CU-OE-CXC, Orange County Superior Court, Honorable Layne H.
18 Melzer, presiding (using an hourly rate of \$450 for work performed in 2024-
19 2026).

20 8. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation
21 since its inception. The details of the work completed by Plaintiff's Counsel in this case are set
22 forth in the declaration of Andrew J. Rowbotham, filed concurrently herewith.

23 9. I confirm that I do not have any interest or involvement in, and am not affiliated
24 with, the proposed settlement administrator, Apex Class Action Administration.

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

1 I declare under penalty of perjury under the laws of the United States and the state of
2 California that the foregoing is true and correct. Executed on July 31, 2026, at El Segundo,
3 California.



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5 Ian T. Mallery