

Aaron A. Bartz (SBN 198722)
BARTZ LAW GROUP, APC
5151 California Ave., Suite 100
Irvine, California 92617
Tel: (949) 504-4413 / Fax: (949) 656-7760
Email: aaron@bartzlawgroup.com

Electronically FILED by
Superior Court of California,
County of Los Angeles
8/28/2025 3:31 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By S. Drew, Deputy Clerk

Walter L. Haines, Esq. (SBN 71075)
UNITED EMPLOYEES LAW GROUP, PC
8605 Santa Monica Blvd., #63354
West Hollywood, CA 90069
Tel.: (562) 256-1047 / Fax: (562) 256-1006
Email: walter@uelglaw.com

Attorneys for Plaintiff PAUL LOWE, and all others similarly situated

[Additional Counsel on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

PAUL LOWE, an individual; on behalf of
himself and all others similarly situated and
the general public,

Plaintiffs,

v.

RAPID RELIABLE TESTING, LLC, a
Delaware limited liability company; RAPID
RELIABLE TESTING CA, LLC, a California
limited liability company; and DOES 1 to 100,
inclusive,

Defendants.

) Case No. 23STCV07047

) [Assigned for All Purposes to:
) The Hon. Theresa M. Traber, Dept. 1]

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

) Date: February 6, 2026
) Time: 10:30 a.m.
) Dept: 1

1 David D. Bibiyan (SBN 287811)
david@tomorrowlaw.com
2 Vedang J. Patel (SBN 328647)
vedang@tomorrowlaw.com
3 Brandon M. Chang (SBN 316197)
brandon@tomorrowlaw.com
4 BIBIYAN LAW GROUP, P.C.
5 8484 Wilshire Blvd., Suite 500
Beverly Hills, CA 90211
6 Tel.: (310) 438-5555 / Fax: (310) 300-1705
7 Attorneys for Plaintiff CORIELYN MARIE HALL
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF WALTER L. HAINES

I, Walter L. Haines, declare:

1. I am an attorney licensed to practice before all courts of the State of California. I am the owner of United Employees Law Group, PC, and am Class Counsel for the Plaintiffs herein. I am a member in good standing of the State Bar of California.

2. I make this declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. I have personal knowledge of the facts herein. If called as a witness, I could and would competently testify to those facts under oath.

3. I am a highly experienced class action counsel specializing in actions of this nature. I have been practicing law for over 40 years and I am highly experienced in actions 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.

4. United Employees Law Group has prosecuted this litigation solely on a contingent-fee basis and has been completely at risk that it would not receive any compensation for prosecuting claims against the Defendants.

5. 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 Defendants 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.

6. In sum, I am well-suited to act as Class Counsel, will continue to vigorously represent the interests of the class, and have adequate resources to do so.

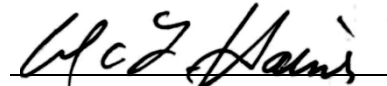
///

///

///

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

3 Executed on August 28, 2025 at Los Angeles, California.
4

5 
6 WALTER L. HAINES
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28