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Attorneys for Plaintiff NADIA SCURRY and all others similarly situated

[Additional Counsel on following page]

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

JENNIFER MACHADO and NADIA
SCURRY, individually and as the State of
California's designated proxies pursuant to the
Private Attorneys General Act (PAGA) on
behalf of the State of California and other
aggrieved employees,

Plaintiffs,

v.

KLAP6 TECHNOLOGIES LLC, a Texas
limited liability company; IEM
INTERNATIONAL, INC., a Delaware
corporation; and DOES 6 through 50,

Defendants.

) Case Nos. 37-2023-00020925-CU-OE-CTL
) (Consolidated with Case o. 37-2023-00022638)
) [Assigned for all purposes to the Hon. Katherine
) A. Bacal, Dept. C-63]

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

Date: November 7, 2025
Time: 1:30 p.m.
Dept: C-63

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Attorneys for Plaintiffs, the Putative Class, and the Aggrieved Employees

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I, Walter L. Haines, declare:

1. I am an attorney licensed to practice before all courts of the State of California and am an attorney of record for the Plaintiffs herein. I am a member in good standing with the State Bar of California. 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 make this Declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement.

3. 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 I 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 Defendant.

5. United Employees Law Group has participated in this litigation and has performed work on behalf of Plaintiffs since the inception of this litigation. The hours submitted with this declaration are solely for work performed on behalf of the class alleged in the above-entitled California action and not any other state or federal matter.

6. I performed, among other things, the following tasks related to this matter:

analyzed initial clients' claims; performed initial investigation inclusive of research necessary for case evaluation and searched court records relative to possible competing cases. I consulted with

co-counsel as to issues relating to the prosecution of this case, participated in its mediation and settlement and reviewed all settlement papers along with orders from the court, law and motion papers and assisted with client liaison and other tasks assigned by lead counsel.

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

8. The total number of hours spent by me on this litigation is 39.50 hours through October 6, 2025. The hours billed are broken down as follows:

Intake and client signup: 6.50

Review documents and correspondence: 30.00

Review and edit MOU, settlement agreement and prelim approval: 1.40

Oversee admin and review and edit final approval: 1.60

Total Hours = 39.50

9. My involvement with the case was primarily in the very initial stages of vetting the potential client, along with verification that there were no conflicting cases existing at that time. During most of the litigation there was ongoing communications with co-counsel discussing strategy and status of litigation.

10. My total lodestar amount through October 6, 2025, is \$28,637.50 (39.50 hours @ \$725/hour).

11. No charges have been included for paralegal or staff time spent on this matter.

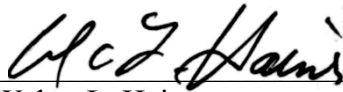
12. My out-of-pocket expenses for postage are \$1.14. Total out of pocket expenses are \$1.14.

13. I believe that the Settlement is fair, adequate, and reasonable. The Settlement provides substantial monetary benefits to Class Members and is a product of diligent efforts of Class Counsel to obtain the best possible result for the Class Members. This Settlement was reached following thorough legal and factual research and analysis, thorough review of extensive data relative to the claims in the action, arduous settlement negotiations, and thorough investigation of the underlying facts by the respective parties and review of records. The

1 settlement negotiations were, at all times, adversarial and non-collusive in nature. The proposed
2 Settlement is within the range of reasonableness, and Class Members have supported the
3 Settlement.

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

6 Executed this 7th day of October 2025 at Los Angeles, California.

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10 Walter L. Haines
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