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[Additional Counsel Listed on Next Page]

Attorneys for Plaintiff CHRISTIAN SANCHEZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA**

CHRISTIAN SANCHEZ, ATU AKINLABI
WATSON, and TYRON WESLEY
MCCARTHER, individuals, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

SPOKE LOGISTICS, LLC, a Wyoming
Limited Liability Company, and Does 1-25,
Inclusive,

Defendant.

Case No. 23-CV-035138

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Victoria Kolakowski
Department 16

CLASS AND REPRESENTATIVE ACTION

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT**

Date: April 14, 2026

Time: 2:30 p.m.

Dept.: 16

Reservation: 408531732666

Complaint filed: June 6, 2023

Trial Date: Not Set

1 SPOKE LOGISTICS, LLC, a California
2 Corporation,

3 Cross-Complainant,

4 v.

5 HE IS THE WAY TRANSPORT
6 SERVICES, INC.,

7 Cross-Defendant.

Complaint filed: September 11, 2023
Trial Date: Not Set

8 **UNITED EMPLOYEES LAW GROUP**

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16 Attorneys for Plaintiffs ATU AKINLABI WATSON and TYRON WESLEY MCCARTHER
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1 I, Walter L. Haines, declare:

2 1. I am an attorney licensed to practice before all courts of the State of California. I
3 am counsel of record for Plaintiff Christian Sanchez in this action. I make this declaration in
4 support of Plaintiff's Motion for Preliminary Approval of Class and Representative Action
5 Settlement. I make this declaration based on my personal knowledge, and if called to testify, I
6 could and would competently testify to the matters contained in this declaration.

7 2. The Settlement Agreement in this action is the result of vigorous and competent
8 representation of Plaintiff, and arms'-length, contentious negotiations with Defendant to reach
9 the best possible outcome for class members and aggrieved employees. Based on my
10 experience as Class Counsel, I believe that the proposed Settlement is fair, reasonable, and
11 adequate for the class and aggrieved employees.

12 3. I am a highly experienced class action attorney, with over 40 years of practice
13 that includes extensive involvement in matters of this nature. I am the most senior attorney in
14 my firm, United Employees Law Group, and worked on the litigation of this matter. I formed
15 United Employees Law Group in 2005, primarily to represent employees in their wage claims.
16 I have represented over 1,500 clients in wage and hour disputes of which more than 300 cases
17 were class actions with settlements totaling over \$400,000,000. These class action cases
18 include Fortune 500 companies such as Pepsi, Intel, Home Depot, Wells Fargo, Bank of
19 America, Cisco Systems, First American Title Co., Yahoo!, WellPoint, Inc., Sun
20 Microsystems, and Kaiser Foundation Hospitals.

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

24 5. I have no conflicts of interest with the class members/aggrieved employees in
25 this action. I am not related to the named Plaintiffs. I have not previously represented
26 Defendant in any matter.

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1 6. In sum, I am well-suited to act as Class Counsel and will continue to vigorously
2 represent the interests of the class members/aggrieved employees.

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

5 Executed this 9th day of March 2026, in Los Angeles, California.

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8 WALTER L. HAINES
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