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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 PLAINTIFFS'  
MOTION FOR: 1) FINAL APPROVAL  
OF CLASS AND REPRESENTATIVE  
ACTION SETTLEMENT AND 2)  
APPROVAL OF ATTORNEYS' FEES  
AND COSTS, ADMINISTRATION  
COSTS, AND CLASS  
REPRESENTATIVES' ENHANCEMENT  
AWARDS**

Date: October 22, 2026

Time: 2:30 p.m.

Dept.: 16

Reservation: A-35138-001

Complaint filed: June 6, 2023

Trial Date: Not Set

Declaration of Walter L. Haines in Support of Plaintiffs' Motion for Final Approval of Class  
and Representative Action Settlement - Case No. 23CV035138

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 as follows:

2 1. I am an attorney duly licensed to practice law in the State of California and am an  
3 attorney of record for Plaintiff CHRISTINA SANCHEZ ("Plaintiff" or "SANCHEZ") in this  
4 Action against Defendants SPOKE LOGISTICS, LLC, ("Defendant"). I am a member in good  
5 standing with the State Bar of California. I make this Declaration in support of Plaintiffs' Motion  
6 for Final Approval of Class and Representative Action Settlement. I make this Declaration based  
7 on my personal knowledge and if called to testify I could and would competently testify to the  
8 matters contained in this Declaration.

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

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

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

25 5. I performed, among other things, the following tasks related to this matter:  
26 analyzed initial clients' claims; performed initial investigation inclusive of research necessary  
27 for case evaluation and searched court records relative to possible competing cases. I  
28 participated in its mediation and settlement and reviewed all settlement papers along with orders

1 from the court, law and motion papers and assisted with client liaison and other tasks assigned  
2 by lead counsel.

3 6. The hourly rate for my time is \$950 per hour which is my usual and customary  
4 hourly rate charged for my services in similar complex class actions.

5 7. The total number of hours spent by me on this litigation is 46.70 hours through  
6 July 16, 2024. The hours billed are broken down as follows:

7 Intake and client signup: 6.50

8 Review documents: 30.00

9 Review and edit MOU, settlement agreement and prelim approval: 5.20

10 Oversee admin and review and edit final approval: 5.00

11 Total Hours = 46.70

12 8. My involvement with the case was primarily in the very initial stages of vetting  
13 the potential client, along with verification that there were no conflicting cases existing at that  
14 time. During most of the litigation there were ongoing communications with co-counsel  
15 discussing strategy and status of litigation. In order to provide the court with a reasonable  
16 estimate of the time involved, all email communications were reviewed, which is the source of  
17 these estimates.

18 9. My total lodestar amount through September 11, 2026, is \$44,365.00 (46.70  
19 hours @ \$950/hour).

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

21 11. My out-of-pocket expenses for postage are \$1.16. My out-of-pocket expenses for  
22 One Legal are \$15.39. Total out of pocket expenses are \$16.55.

23 12. I believe that the Settlement is fair, adequate, and reasonable. The Settlement  
24 provides substantial monetary benefits to class members and is a product of diligent efforts of  
25 Class Counsel to obtain the best possible result for the class members. This Settlement was  
26 reached following thorough legal and factual research and analysis, thorough review of extensive  
27 data relative to the claims in the action, arduous settlement negotiations, and thorough  
28 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  
5 the foregoing is true and correct and this declaration is executed on September 11, 2026, in  
6 Los Angeles, California.

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10 Walter L. Haines