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

SOMALIA GOODWIN, JUAN CARLOS  
QUEVEDO, DUSTIN JOHNSON and JOHN  
A. MCGEHEE, as individuals on behalf of  
themselves and on behalf of all others  
similarly situated,

Plaintiffs,

v.

SAVE MART SUPERMARKETS, LLC, a  
California Limited Liability Company; and  
DOES 1-100, inclusive,

Defendants.

Case No.: (Lead) STK-CV-UOE-2023-2062;  
SCV-273343 (MCGEHEE class action) filed  
in Sonoma county; SCV-273793  
(MCGEHEE PAGA action) filed in Sonoma  
county

**DECLARATION OF PAUL K. HAINES  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Date: March 25, 26, 27, April 1, 2  
Time: 9:00AM  
Dept.: 10D

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I, Paul K. Haines, declare as follows:

2. I am a 2006 graduate of Pepperdine University School of Law, where I graduated cum laude. During law school, I worked as a law clerk for the appellate firm of Horvitz & Levy, located in Encino, California. I also spent a semester in law school working as an extern for the Honorable Edward Rafeedie, District Judge for the United States District Court for the Central District of California.

4. During my employment at Littler Mendelson, I played a significant role in the class actions that I was staffed on, as I was often the only associate staffed on such cases. In particular, I received a wide-array of wage and hour class action experience performing the following types of tasks: drafting demurrers, motions to strike and/or dismiss; removing actions from state court to federal court; drafting and responding to written discovery; drafting and opposing discovery related motions; arguing discovery related motions; drafting motions to consolidate related matters; interviewing putative class members and obtaining declarations in connection with class certification; drafting oppositions to motions for class certification; drafting motions for decertification following class certification; conducting exposure analyses to assess

1 the strengths and weaknesses of asserted claims, the likelihood of prevailing at class certification  
2 and potential damages resulting from such claims; drafting mediation briefs; serving as the  
3 primary contact to in-house counsel; deposing named plaintiffs and putative class members;  
4 deposing retained expert witnesses; and defending the depositions of corporate witnesses. In  
5 short, I played an integral role in all aspects of litigation from the inception of a matter through  
6 and beyond class certification. I also supervised the work of several junior attorneys who were  
7 staffed on the same wage and hour class actions.

8         5.       In June 2011, I voluntarily resigned from Littler Mendelson in order to accept an  
9 associate attorney position with the international law firm of Morgan, Lewis & Bockius LLP, at  
10 its Los Angeles office, where I began working in July 2011. During my employment at Morgan,  
11 Lewis & Bockius LLP, I worked exclusively on the defense of wage and hour class and collective  
12 actions. For the vast majority of these cases, I was the only associate staffed on the matter, and I  
13 performed the same job duties as described in the immediately preceding paragraph. In addition  
14 to working on wage and hour class actions, I also worked on a number of “hybrid” actions  
15 asserting nationwide wage and hour claims under the Fair Labor Standards Act (“FLSA”), as well  
16 as California-specific claims under Rule 23 of the Rules of Civil Procedure.

17         6.       In July 2012, I transitioned into litigating wage and hour class actions from the  
18 Plaintiff’s side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since  
19 February 2016, as a Shareholder of the Haines Law Group, APC. Currently, over ninety percent  
20 (90%) of my practice is dedicated exclusively to the prosecution of wage and hour class actions,  
21 and I am currently responsible for prosecuting over fifty (50) wage and hour class actions filed in  
22 both State and Federal courts throughout California. I have been appointed as Class Counsel in  
23 hundreds of wage and hour class action settlements in state and federal courts within California.  
24 A few examples of the matters in which I have been appointed as Class Counsel, all of which  
25 have been granted final approval, include the following: *Sanchez v. Res-Care, Inc.*, Case No.  
26 BC526175, California Superior Court, County of Los Angeles, Hon. John Shepard Wiley, Jr.,  
27 presiding; *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United  
28 States District Court, Central District of California, Hon. John F. Walter presiding; *Tesla Motors*

1 *Wage and Hour Litigation*, JCCP 4792, California Superior Court, Santa Clara County, Hon.  
2 Peter H. Kirwan presiding; *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States  
3 District Court, Northern District of California, Hon. Haywood S. Gilliam, Jr. presiding;  
4 *Longstreth v. PAQ, Inc., dba Food 4 Less*, Case No. 15CV-0206, California Superior Court,  
5 County of San Luis Obispo, Hon. Charles S. Crandall presiding; *Nunez v. CompuCom Systems,*  
6 *Inc.*, Case No. BC618385, California Superior Court, County of Los Angeles, Hon. John Shepard  
7 Wiley, Jr. presiding; *Mansilla v. Haeco Americas Line Services, LLC, et al*, Case No. BC615310,  
8 Superior Court of California, County of Los Angeles, Hon. Elihu M. Berle presiding; *Leverage,*  
9 *et al v. Traeger Pellet Grills, LLC, et al*, Case No. 4:16-cv-00784-KAW, United States District  
10 Court, Northern District of California, Hon. Kandis A. Westmore presiding.

11 7. I have also moved to certify and have received an order certifying a class action  
12 and/or conditionally certifying a collective action, in the following cases:

- 13 • *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-  
14 CXC, California Superior Court, County of Orange, Honorable Judge Gail A. Andler,  
15 presiding (certifying a class of employees who were misclassified as independent  
16 contractors);
- 17 • *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United  
18 States District Court, Central District of California, Honorable Judge Beverly Reid  
19 O'Connell, presiding (conditionally certifying an unpaid FLSA overtime wage class);
- 20 • *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States  
21 District Court, Central District of California, Honorable Judge John F. Walter, presiding  
22 (certifying a rest period violation class and conditionally certifying an FLSA unpaid  
23 overtime wage class);
- 24 • *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court,  
25 Northern District of California, Honorable Judge Haywood S. Gilliam, Jr., presiding  
26 (conditionally certifying an unpaid FLSA overtime wage class);
- 27 • *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States  
28 District Court, Eastern District of California, Honorable Jennifer L. Thurston, presiding

(conditionally certifying an unpaid FLSA overtime wage class);

- *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge William Claster, presiding (certifying unpaid overtime wage class and waiting time penalty class);
- *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-775372-CU-OE-CXC, California Superior Court, County of Orange, Honorable Glenda Sanders, presiding (certifying piece rate pay plan classes, expense reimbursement class, wage statement class, and waiting time penalties class);
- *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United States District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six classes of employees for rest period violations, wage statement violations, meal period violations, and overtime and double-time violations);
- *Vazquez, et al v. Kraft Heinz Foods Company*, Case No. 16-cv-2749-WQH-BLM, United States District Court, Southern District of California, Honorable William Q. Hayes presiding (certifying six classes of employees for unpaid wages, meal period violations, wage statement violations, and waiting time penalties);
- *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA, United States District Court, Northern District of California, Honorable William H. Alsup presiding (certifying three classes of employees for unlawful wage deduction violations, wage statement violations, and waiting time violations);
- *Staublein v. Wells Fargo Bank*, No. CIVDS1712267, San Bernardino County Superior Court, Honorable David S. Cohn presiding (certifying wage statement class);
- *Perez v. Sunbelt Rentals, Inc.* Case No. 37-2018-00026405-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Eddie C. Sturgeon presiding (certifying class of employees for wage statement violations);
- *Bowlin-Burdick, et al v. Life Care Centers of America, Inc.*, Case No. BC657139, Los Angeles County Superior Court, Honorable Maren E. Nelson presiding (certifying four classes for meal period violations, rest period violations, wage statement violations, and

1 waiting time penalties);

- 2 • *McDonald, et al. v. Sierra Pacific Industries*, Case No. 191133, Shasta County Superior  
3 Court, Hon. Tamara L. Wood (certifying eight classes for meal period violations, rest  
4 period violations, unpaid wages, unreimbursed business expenses, wage statement  
5 violations, and waiting time penalties);
- 6 • *Danica N. Keich, et al. v. U.S. Healthworks, Inc., et al.*, Case No. 37-2017-00015343-CU-  
7 OE-CTL, San Diego County Superior Court, Honorable Eddie C. Sturgeon, presiding  
8 (certifying classes for rest period violations, meal period violations, on-call pay violations,  
9 wage statement violations, and waiting time violations);
- 10 • *George Gomez v. The Bedrock Company*, Case No. CIVDS1824255, San Bernardino  
11 County Superior Court, Honorable David Cohn, presiding (certifying claims for unpaid  
12 overtime and minimum wage violations, meal period violations, rest period violations,  
13 wage statement violations, and waiting time penalties); and
- 14 • *Aurora Gatica v. Valley Ag, Inc. et al.*, Case No. 19CECG03018, Fresno County Superior  
15 Court, Honorable Tyler D. Tharpe, presiding (certifying claims for meal period violations,  
16 rest period violations, wage statement violations, and waiting time penalties).

17 8. In 2015, 2016, and 2017, Thomson Reuters recognized me as a Top Young  
18 Attorney in Southern California in the annual Rising Stars Edition of Super Lawyer. This is an  
19 honor awarded to no more than two-and-a-half percent of attorneys under the age of forty in  
20 Southern California each year. In 2018, 2019, 2020, and 2021, Thomson Reuters recognized me  
21 as a “Super Lawyer” in the annual Super Lawyer magazine, an honor awarded to no more than  
22 five percent of all attorneys in Southern California each year.

23 9. As co-counsel for Plaintiffs and the proposed Settlement Class, I have been  
24 intimately involved in every aspect of this case, and I believe that the proposed Settlement is a  
25 favorable result for the Settlement Class.

26 10. On November 27, 2023, Plaintiff Juan Carlos Quevedo, through my office, filed a  
27 wage and hour class action lawsuit entitled *Juan Carlos Quevedo v. Save Mart Supermarkets*  
28 *LLC, et al.*, Contra Costa County Superior Court Case No. C23-02995 (the “Quevedo Action”).

1 The *Quevedo* Action alleges causes of action for failure to pay all overtime wages, meal period  
2 violations, rest period violations, wage statement violations, waiting time penalties, civil penalties  
3 under the Private Attorneys General Act, and unfair competition. Plaintiff Quevedo sought to  
4 represent all non-exempt employees employed by Defendant during the putative class period.

5 11. After the filing of the *Quevedo* Action, I was informed that other related wage and  
6 hour class and representative actions were pending against Defendants in various Courts  
7 throughout the State of California, including the matters of *Somalia Goodwin v. Save Mart*  
8 *Supermarkets, LLC*, Case No. STK-CV-UOE-2023-2062, which was filed on March 3, 2023  
9 (“*Goodwin*”), *John A. McGehee v. Save Mart Supermarkets, LLC*; *The Save Mart Companies,*  
10 *LLC.*, Case No. SCV-273343 filed on May 22, 2023 (class action), and *John A. McGehee v. Save*  
11 *Mart Supermarkets, LLC*; *The Save Mart Companies, LLC.*, Case No. SCV-273793 filed on July  
12 27, 2023 (PAGA action) (collectively referred to as “*McGehee*”);

13 12. The Parties reached a global class-wide settlement following mediation of these  
14 related wage and hour class and representative actions.

15 I declare under penalty of perjury under the laws of the State of California that the  
16 foregoing is true and correct. Executed on January 14, 2025, at El Segundo, California.

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19 Paul K. Haines  
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