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Attorneys for Plaintiff on behalf of herself and all others similarly situated
(Additional Counsel on Next Page)

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN JOAQUIN

STACEY L. GRIMSON, an individual, on behalf of herself and all others similarly situated,

Plaintiff,

v.

PROVIDENT CARE, INC., a California Corporation; and DOES 1-10, Inclusive,

Defendants.

Case No. STK-CV-UOE-2025-0014893
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Blanca Bañuelos
Department 10B

CLASS AND REPRESENTATIVE ACTION

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

Date: TBD
Time: 9:00 a.m.
Dept.: 10B

Complaint filed: October 10, 2025
Trial date: Not Set

UNITED EMPLOYEES LAW GROUP
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Attorneys for Plaintiff on behalf of herself
and all others similarly situated

I, Walter L. Haines, declare:

1. I am an attorney licensed to practice before all courts of the State of California. I am counsel of record for Plaintiff Stacey L. Grimson in this action. I make this declaration in support of Plaintiff's Motion for Preliminary Approval of Class and Representative Action Settlement. 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. The Settlement Agreement in this action is the result of vigorous and competent representation of Plaintiff, and arms'-length, contentious negotiations with Defendant to reach the best possible outcome for class members and aggrieved employees. Based on my experience as Class Counsel, I believe that the proposed Settlement is fair, reasonable, and adequate for the class and aggrieved employees.

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 in 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, 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. I have no conflicts of interest with the class members/aggrieved employees in this action. I am not related to the named Plaintiff. I have not previously represented Defendant in any matter.

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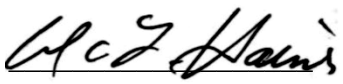
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6. In sum, I am well–suited to act as Class Counsel and will continue to vigorously represent the interests of the class members/aggrieved employees.

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

Executed this 14th day of October 2026, in Los Angeles, California.



WALTER L. HAINES

