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7 Attorneys for Plaintiff,

8 HEATHER RODRIGUEZ, and all others similarly situated

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF VENTURA**

11 **(UNLIMITED JURISDICTION)**

12
13 HEATHER RODRIGUEZ, on behalf of herself,
14 all others similarly situated, the general public,
15 and as an “aggrieved employee” on behalf of
16 other “aggrieved employees” under the Labor
Code Private Attorneys General Act of 2004,

17 *Plaintiff(s),*

18 vs.

19 SCJM2, LLC, a California limited liability
20 company; and DOES 1–50, inclusive,

21 *Defendant(s).*

Case No. 2023CUOE008247

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
HEATHER RODRIGUEZ’S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Hearing Date: February 24, 2025

Hearing Time: 8:30 a.m.

Hearing Dept.: 42, The Honorable Henry
J. Walsh



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25 **SPIVAK LAW**
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I, WALTER L. HAINES, declare as follows:

2. I am a highly experienced class action counsel specializing in actions of this nature. I have been practicing law for over 40 years and I am highly experienced in actions of this nature. I am the most senior attorney at 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, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co., Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

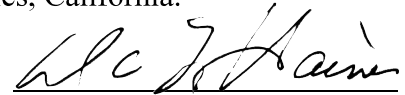
3. I have no conflicts of interest with the class or with the Class Representative. I am not related to the representative plaintiff. I have not previously represented Defendant in any matter. I do not represent opposing factions within the class in that all claims are predicated upon the same theories of liability and benefit all class members equally. In sum, I am well-suited to act as Class Counsel and will continue to vigorously represent the interests of the class.

4. I am not aware of any class, representative, or other collective action in any other court, in this, or any other jurisdiction, that asserts claims similar to those asserted in this action, on behalf of the class or group of individuals, some or all of whom would also be members of the class to find in this action. I have made a reasonable inquiry of the other members of my law firm to determine whether they are aware of any such similar actions. Based on these inquiries, I am aware of no such similar actions.

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



Executed on Friday, January 24, 2025 at Los Angeles, California.


WALTER L. HAINES,
Declarant



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