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9 Attorneys for Plaintiff(s),

10 TAYLOR SNOW, and all others similarly situated

11 (Additional attorneys for Plaintiff(s) on following page)

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **FOR THE COUNTY OF MONTEREY**

14 **(UNLIMITED JURISDICTION)**

15 TAYLOR SNOW, on behalf of herself and as an
16 “aggrieved employee” on behalf of other
17 “aggrieved employees” under the Labor Code
18 Private Attorneys General Act of 2004,

19 *Plaintiff,*

20 vs.

21 555 OCEAN VIEW BLVD LLC (D/B/A
22 SEVEN GABLES INN), a California limited
23 liability company; KIRKWOOD
24 COLLECTION, INC., a California corporation;
25 KIRKWOOD COLLECTION HOLDINGS
26 LLC, a California limited liability company; and
27 DOES 1–50, inclusive,

28 *Defendants.*

Case No. 23CV001630

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
TAYLOR SNOW’S MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Hearing Date: May 22, 2026

Hearing Time: 8:30 a.m.

Hearing Dept.: 14, The Honorable Ian A.
Rivamonte

Action filed: May 19, 2023



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1 **DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR**
2 **APPROVAL OF PAGA SETTLEMENT**

3 I, WALTER L. HAINES, declare as follows:

4 1. I am an attorney duly licensed to practice law in the State of California and am
5 an attorney of record for Plaintiff Taylor Snow (“Plaintiff”) in her lawsuit against Defendants
6 555 Ocean View Blvd LLC (D/B/A Seven Gables Inn), Kirkwood Collection, Inc., And
7 Kirkwood Collection Holdings LLC (collectively “Defendants”). I am a member in good
8 standing of the State Bar of California. I make this Declaration in support of Plaintiff’s Motion
9 for Approval of PAGA Settlement. I make this Declaration based on my personal knowledge
10 and if called to testify I could and would competently testify to the matters contained in this
11 Declaration.

12 2. 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 at
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 include
18 Fortune 500 companies such as Pepsi, Intel, Home Depot, Kaiser, Wells Fargo, Bank of
19 America, Cisco Systems, First American Title Co., Yahoo!, WellPoint, Inc., Sun Microsystems,
20 and Kaiser Foundation Hospitals.

21 3. I have no conflicts of interest with the Aggrieved Employees or with the
22 Individual Plaintiff Settlement. I am not related to the representative plaintiff. I have not
23 previously represented Defendants in any matter. I do not represent opposing factions within the
24 Aggrieved Employees in that all claims are predicated upon the same theories of liability and
25 benefit all Aggrieved Employees equally. In sum, I am well-suited to act as PAGA Counsel and
26 will continue to vigorously represent the interests of the Aggrieved Employees.

27 4. United Employees Law Group has prosecuted this litigation solely on a
28 contingent-fee basis, and has been completely at risk that it would not receive any compensation



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1 for prosecuting claims against the Defendants.

2 5. United Employees Law Group has participated in this litigation and has
3 performed work on behalf of Plaintiff Taylor Snow since the inception of this litigation. The
4 hours submitted with this declaration are solely for work performed on behalf of the Aggrieved
5 Employees alleged in the above-entitled California action and not any other state or federal
6 matter.

7 6. I performed, among other things, the following tasks related to this matter:
8 analyzed initial clients' claims; performed initial investigation inclusive of research necessary
9 for case evaluation and searched court records relative to possible competing cases. I consulted
10 with co-counsel as to issues relating to the prosecution of this case, participated in its settlement
11 and reviewed all settlement papers along with orders from the court, and assisted with client
12 liaison and other tasks assigned by lead counsel.

13 7. The hourly rate for my time is \$725.00 per hour which is my usual and customary
14 hourly rate charged for my services in similar complex class and representative actions.

15 8. The total number of hours spent by me on this litigation is 26.50 hours through
16 April 21, 2026.

17 9. My total lodestar amount through April 21, 2026, is \$19,212.50.

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

19 11. My out-of-pocket expenses for postage are \$1.14. Total out of pocket expenses
20 are \$1.14.

21 12. I believe that the Settlement is fair, adequate, and reasonable. The Settlement
22 provides substantial monetary benefits to the Aggrieved Employees and is a product of diligent
23 efforts of Plaintiff's Counsel to obtain the best possible result for the Aggrieved Employees.
24 This Settlement was reached following thorough legal and factual research and analysis,
25 thorough review of extensive data relative to the claims in the action, arduous settlement
26 negotiations, and thorough investigation of the underlying facts by the respective parties and
27 review of records. The settlement negotiations were, at all times, adversarial and non-collusive
28 in nature. The proposed Settlement is within the range of reasonableness, and the Aggrieved



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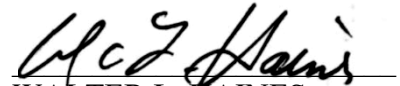
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1 Employees have supported the Settlement.

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

4 Executed on Tuesday, April 21, 2026 at Los Angeles, California.

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8 WALTER L. HAINES,
9 Declarant
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