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Attorneys for Plaintiff KELSEY WOLFF, on behalf of herself and other aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

KELSEY WOLFF, an individual; on behalf of
herself and other aggrieved employees,

Plaintiffs,

vs.

ENTERPRISE FLEET MANAGEMENT,
INC., a Missouri corporation; and DOES 1
through 100, inclusive,

Defendants.

) Case No. 23STCV16885

)
) *[Assigned For All Purposes To Judge Kevin C.
Brazile, Dept: 20]*

) **DECLARATION OF WALTER L.
HAINES IN SUPPORT OF MOTION TO
APPROVE PAGA SETTLEMENT**

) Date: July 2, 2024

) Time: 8:30 a.m.

) Dept.: 20

1 **DECLARATION OF WALTER HAINES IN SUPPORT OF PLAINTIFF’S MOTION**
2 **FOR APPROVAL OF PAGA SETTLEMENT AND RELEASE**

3 I, Walter L. Haines, declare:

4 1. I am counsel of record for Plaintiff Kelsey Wolff (hereafter referred to as
5 “Plaintiff” or “Wolff”) in this action against Defendant Enterprise Fleet Management, Inc.
6 (“Defendant”). I am a member in good standing of the State Bar of California. I make this
7 Declaration in support of Plaintiff’s Motion for Approval of PAGA Settlement and Release. I
8 make this Declaration based on my personal knowledge and if called to testify I could and
9 would competently testify to the matters contained in this Declaration.

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

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

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

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

1 6. I performed, among other things, the following tasks related to this matter:
2 analyzed initial clients' claims; performed initial investigation inclusive of research necessary
3 for case evaluation and searched court records relative to possible competing cases. I consulted
4 with co-counsel as to issues relating to the prosecution of this case, reviewed all settlement
5 papers, law and motion papers, along with orders from the court, and assisted with client liaison
6 and other tasks assigned by lead counsel.

7 7. The hourly rate for my time is \$725 per hour which is my usual and customary
8 hourly rate charged for my services in similar complex class and representative actions.

9 8. The total number of hours spent by me on this litigation is 14.30 hours through
10 April 19, 2024.

11 9. My total lodestar amount through April 19, 2024 is \$10,367.50.

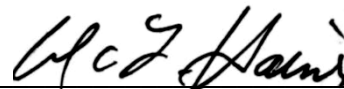
12 10. No charges have been included for paralegal or staff time spent on this matter.

13 11. My out of pocket expenses for postage are 1.16. Total out of pocket expenses
14 are \$1.16.

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

24 I declare under penalty of perjury under the laws of the United States and California that
25 the foregoing is true and correct.

26 Executed this 19th day of April, 2024 at Los Angeles, California.

27 

28 Walter L. Haines,
Declarant