

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Andrew J. Rowbotham (SBN 301367)
arowbotham@haineslawgroup.com
Ian T. Mallery (SBN 359132)
imallery@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355
Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

ALICIA ESQUIVEL GERLETTE, as an
individual and on behalf of all others similarly
situated,

Plaintiff,

vs.

ALTMAN SPECIALTY PLANTS, LLC, a
California Limited Liability Company; and
DOES 1 through 100, inclusive,

Defendant.

Case No.: 30-2023-01324651-CU-OE-CXC

*[Assigned for all purposes to the Hon. Layne H.
Melzer, Dept. CX102]*

**DECLARATION OF IAN T. MALLERY IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS AND
PAGA ACTION SETTLEMENT, CLASS
REPRESENTATIVE ENHANCEMENT
PAYMENT, ATTORNEYS' FEES AND
COSTS**

Date: July 23, 2026

Time: 2:00 p.m.

Dept.: CX102

Action Filed: May 10, 2023

Trial Date: None Set

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I, IAN T. MALLERY, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Alicia Esquivel Gerlette (“Plaintiff”) in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I received a Bachelor of Arts degree from Washington University in St. Louis in 2021, and a Juris Doctor from the University of Minnesota Law School in 2024. I was admitted to the California State Bar in December 2024.

3. During law school, I served as Student Director of the University of Minnesota Clemency Project Clinic and was selected as a Human Rights Fellow with the University of Minnesota Human Rights Center.

4. Prior to and during law school I interned and clerked for the American Civil Liberties Union of Missouri, where I worked on individual civil rights litigation cases, including drafting complaints, memoranda, and briefs on substantive litigation issues. I also participated in a year-long internship with the National Labor Relations Board – Region 18, where I investigated unfair labor practices charges, negotiated settlements, drafted memoranda, and issued complaints on behalf of the General Counsel. Since September 2024, I have worked at Haines Law Group, APC, first as a law clerk then as an associate attorney once I was admitted to the California State Bar in December 2024.

5. Although non-exhaustive, the types of tasks I have performed include: conducting client intakes, drafting complaints, attending court hearings in state and federal courts, corresponding with opposing counsel, drafting and responding to written discovery, drafting and opposing a variety of motions including motions for summary judgment, drafting mediation briefs, attending mandatory settlement conferences, drafting long-form settlement agreements, and drafting motions for preliminary and final settlement approval.

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6. The following is a non-exhaustive list of the class action settlements in which I played a major role assisting Class Counsel, and which have been granted final approval: *Raul Camacho v. Residential Fire Systems, Inc.* Case No. 30-2015-775372-CU-OE-CXC, Orange County Superior Court; *Ruben Hernandez v. Neovia Logistics Services, LLC*, Case No. CIVSB2305867, San Bernardino County Superior Court; *Juan David Arreola Carillo v. KPS Global, LLC*, Case No. 22STCV19527, Los Angeles County Superior Court; *Eric Prado v. Wilwood Engineering*, Case No. 2023CUOE015773, Ventura County Superior Court; *Alfonso Almaraz v. World Oil Corp.*, Case No. 23STCV18296, Los Angeles County Superior Court; *Angel Sanchez v. Ickler Electric Corporation*, Case No. 37-2024-00017621-CU-OE-CTL, San Diego County Superior Court.

7. I have been named as Class Counsel and awarded attorney's fees following a lodestar cross-check in the following cases:

- *Vicente Sandoval v. Cybex Security Solutions, LLC, et al.*, Case No. 30-2024-01398109-CU-OE-CXC, Orange County Superior Court, Honorable Layne H. Melzer, presiding (using an hourly rate of \$450 for work performed in 2024-2026).

8. Based on my experience, the nature of the work I performed in this case, and the hourly rate previously approved for my work in a comparable wage-and-hour class action, I submit my time in this matter at an hourly rate of \$450.00.

9. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation since I first joined Haines Law Group, APC. The details of the work completed by Plaintiff's Counsel in this case are set forth in the declaration of Andrew J. Rowbotham, filed concurrently herewith.

10. I confirm that I do not have any interest or involvement in, and am not affiliated with, the proposed settlement administrator, Phoenix Settlement Administrators.

11. I understand that the related actions involving Defendant are addressed in paragraphs 24 through 26 of the concurrently filed Declaration of Andrew J. Rowbotham..

1 I declare under penalty of perjury under the laws of the United States and the state of
2 California that the foregoing is true and correct. Executed on June 23, 2026, at El Segundo,
3 California.

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