

Jonathan M. Genish (State Bar No. 259031)
jgenish@blackstonepc.com
Miriam L. Schimmel (State Bar No. 185089)
mschimmel@blackstonepc.com
Joana Fang (State Bar No. 309623)
jfang@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
Jared C. Osborne (State Bar No. 335968)
josborne@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiffs Demaris Masadas and Koa Garces

[Additional Counsel on Following Page]

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

DEMARIS MASADAS and KOA
GARCES, individually, and on behalf of
Aggrieved Employees pursuant to the
California Private Attorneys General Act,

Plaintiffs,

vs.

CALIFORNIA DINNER
ENTERTAINMENT, LLC dba PIRATE'S
DINNER ADVENTURE, a Florida limited
liability company; and DOES 1 through 25,
inclusive,

Defendants.

Case No. 30-2023-01354556-CU-OE-CJC

[Assigned to Hon. Melissa R. McCormick,
Dept. CX105]

**DECLARATION OF PAUL K. HAINES
IN SUPPORT OF PLAINTIFFS'
MOTION FOR APPROVAL OF
SETTLEMENT OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT AND REASONABLE
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT PAYMENTS**

Reservation ID: 74743689
Date: March 12, 2026
Time: 2:00 p.m.
Dept.: CX105

Complaint Filed: October 3, 2023
Trial Date: None Set

1 **HAINES LAW GROUP, APC**

2 Paul K. Haines (SBN 248226)

3 E-Mail: phaines@haineslawgroup.com

4 Sean M. Blakely (SBN 264384)

5 E-Mail: sblakely@haineslawgroup.com

6 Joel M. Gordon (SBN 280721)

7 E-Mail: jgordon@haineslawgroup.com

8 2155 Campus Drive, Suite 180

9 El Segundo, California 90245

10 Tel: (424) 292-2350

11 Fax: (424) 292-2355

12 Attorneys for Plaintiff Jacob Parcell

1 I, PAUL K. HAINES, declare as follows:

2 1. I am a shareholder and principal of Haines Law Group, APC, and co-counsel for
3 the named Plaintiffs Demaris Masadas and Koa Garces in the above-captioned matter, and
4 counsel for Plaintiff Jacob Parcell in the matter titled *Jacob Parcell v. California Dinner*
5 *Entertainment, LLC*, Case No. 30-2023-01350262-CU-OE-CXC (together with Plaintiffs
6 Masadas and Garces, “Plaintiffs”), and the Aggrieved Employees in the above-captioned matter.
7 I am a member in good standing of the bar of the State of California and am admitted to practice
8 in this Court. I have personal knowledge of the facts stated in this declaration and could testify
9 competently to them if called upon to do so.

10 2. I am a 2006 graduate of Pepperdine University School of Law, where I graduated
11 cum laude. During law school, I worked as a law clerk for the appellate firm of Horvitz & Levy,
12 located in Encino, California. I also spent a semester in law school working as an extern for the
13 Honorable Edward Rafeedie, District Judge for the United States District Court for the Central
14 District of California.

15 3. Since graduating from law school, my practice has focused almost exclusively on
16 employment litigation. In September 2007, I began working as an associate attorney at the
17 international law firm of Littler Mendelson P.C., at its Los Angeles office, which according to
18 its website is the “largest U.S.-based law firm exclusively devoted to representing management
19 in every aspect of labor and employment law.” While at Littler Mendelson, I was primarily
20 staffed on wage and hour class actions venued in both state and federal courts, and I also worked
21 on a number of single and multi-plaintiff wage and hour matters as well.

22 4. During my employment at Littler Mendelson, I played a significant role in the
23 class actions that I was staffed on, as I was often the only associate staffed on such cases. In
24 particular, I received a wide-array of wage and hour class action experience performing the
25 following types of tasks: drafting demurrers, motions to strike and/or dismiss; removing actions
26 from state court to federal court; drafting and responding to written discovery; drafting and
27 opposing discovery related motions; arguing discovery related motions; drafting motions to
28 consolidate related matters; interviewing putative class members and obtaining declarations in

1 connection with class certification; drafting oppositions to motions for class certification;
2 drafting motions for decertification following class certification; conducting exposure analyses
3 to assess the strengths and weaknesses of asserted claims, the likelihood of prevailing at class
4 certification and potential damages resulting from such claims; drafting mediation briefs; serving
5 as the primary contact to in-house counsel; deposing named plaintiffs and putative class
6 members; deposing retained expert witnesses; and defending the depositions of corporate
7 witnesses. In short, I played an integral role in all aspects of litigation from the inception of a
8 matter through and beyond class certification. I also supervised the work of several junior
9 attorneys who were staffed on the same wage and hour class actions.

10 5. In June 2011, I voluntarily resigned from Littler Mendelson in order to accept an
11 associate attorney position with the international law firm of Morgan, Lewis & Bockius LLP, at
12 its Los Angeles office, where I began working in July 2011. During my employment at Morgan,
13 Lewis & Bockius LLP, I worked exclusively on the defense of wage and hour class and collective
14 actions. For the vast majority of these cases, I was the only associate staffed on the matter, and I
15 performed the same job duties as described in the immediately preceding paragraph. In addition
16 to working on wage and hour class actions, I also worked on a number of “hybrid” actions
17 asserting nationwide wage and hour claims under the Fair Labor Standards Act (“FLSA”), as
18 well as California-specific claims under Rule 23 of the Rules of Civil Procedure.

19 6. In July 2012, I transitioned into litigating wage and hour class actions from the
20 Plaintiff’s side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since
21 February 2016, as a Shareholder of the Haines Law Group, APC. Currently, over ninety percent
22 (90%) of my practice is dedicated exclusively to the prosecution of wage and hour class actions,
23 and I am currently responsible for prosecuting over one hundred (100) wage and hour class
24 actions filed in both State and Federal courts throughout California. I have been appointed as
25 Class Counsel in over two hundred (200) wage and hour class action settlements in state and
26 federal courts within California. A few examples of the matters in which I have been appointed
27 as Class Counsel, all of which have been granted final approval, include the following: *Sanchez*
28 *v. Res-Care, Inc.*, Case No. BC526175, California Superior Court, County of Los Angeles, Hon.

1 John Shepard Wiley, Jr., presiding; *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-
2 3170 JFW (Ex), United States District Court, Central District of California, Hon. John F. Walter
3 presiding; *Tesla Motors Wage and Hour Litigation*, JCCP 4792, California Superior Court, Santa
4 Clara County, Hon. Peter H. Kirwan presiding; *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712
5 HSG, United States District Court, Northern District of California, Hon. Haywood S. Gilliam,
6 Jr. presiding; *Longstreth v. PAQ, Inc., dba Food 4 Less*, Case No. 15CV-0206, California
7 Superior Court, County of San Luis Obispo, Hon. Charles S. Crandall presiding; *Nunez v.*
8 *CompuCom Systems, Inc.*, Case No. BC618385, California Superior Court, County of Los
9 Angeles, Hon. John Shepard Wiley, Jr. presiding; *Mansilla v. Haeco Americas Line Services,*
10 *LLC, et al*, Case No. BC615310, Superior Court of California, County of Los Angeles, Hon.
11 Elihu M. Berle presiding; *Leverage, et al v. Traeger Pellet Grills, LLC, et al*, Case No. 4:16-cv-
12 00784-KAW, United States District Court, Northern District of California, Hon. Kandis A.
13 Westmore presiding.

14 7. I have also moved to certify and have received an order certifying a class action
15 and/or conditionally certifying a collective action, in the following cases:

- 16 • *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-
17 CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge
18 Gail A. Andler, presiding (certifying a class of employees who were misclassified
19 as independent contractors);
- 20 • *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx),
21 United States District Court, Central District of California, Honorable Judge
22 Beverly Reid O'Connell, presiding (conditionally certifying an unpaid FLSA
23 overtime wage class);
- 24 • *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex),
25 United States District Court, Central District of California, Honorable Judge John
26 F. Walter, presiding (certifying a rest period violation class and conditionally
27 certifying a FLSA unpaid overtime wage class);
- 28 • *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District

1 Court, Northern District of California, Honorable Judge Haywood S. Gilliam, Jr.,
2 presiding (conditionally certifying an unpaid FLSA overtime wage class);

3 • *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT,
4 United States District Court, Eastern District of California, Honorable Jennifer L.
5 Thurston, presiding (conditionally certifying an unpaid FLSA overtime wage
6 class);

7 • *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-
8 CXC, California Superior Court, County of Orange, Honorable Judge William
9 Claster, presiding (certifying unpaid overtime wage class and waiting time
10 penalty class);

11 • *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-775372-CU-OE-
12 CXC, California Superior Court, County of Orange, Honorable Glenda Sanders,
13 presiding (certifying piece rate pay plan classes, expense reimbursement class,
14 wage statement class, and waiting time penalties class);

15 • *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx),
16 United States District Court, Central District of California, Honorable Dolly M.
17 Gee presiding (certifying six classes of employees for rest period violations, wage
18 statement violations, meal period violations, and overtime and double-time
19 violations);

20 • *Vasquez v. Kraft Heinz Foods Company*, Case No. 16-cv-2749-WQH-BLM,
21 United States District Court, Southern District of California, Honorable William
22 Q. Hayes presiding (certifying classes for automatic meal period deductions,
23 manual time deductions, late meal periods, and derivative wage statement and
24 waiting time penalties);

25 • *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-
26 06874-WHA, United States District Court, Northern District of California,
27 Honorable William H. Alsup presiding (certifying three classes of employees for
28 unlawful wage deduction violations, wage statement violations, and waiting time

violations);

- *Barbara J. Bowlin-Burdick v. Life Care Centers of America, Inc.*, Case No. BC657139, Los Angeles County Superior Court, Honorable Maren E. Nelson, presiding (certifying classes for late meal period violations, on-remises rest period violations, wage statement violations, and waiting time violations);
- *Staublein v. Wells Fargo Bank, National Association*, Case No. CIVDS1712267, San Bernardino County Superior Court, Honorable David Cohn, presiding (certifying a wage statement class);
- *Danica N. Keich, et al. v. U.S. Healthworks, Inc., et al.*, Case No. 37-2017-00015343-CU-OE-CTL, San Diego County Superior Court, Honorable Eddie C. Sturgeon, presiding (certifying classes for rest period violations, meal period violations, on-call pay violations, wage statement violations, and waiting time violations);
- *George Gomez v. The Bedrock Company*, Case No. CIVDS1824255, San Bernardino County Superior Court, Honorable David Cohn, presiding (certifying claims for unpaid overtime and minimum wage violations, meal period violations, rest period violations, wage statement violations, and waiting time penalties);
- *McDonald, et al. v. Sierra Pacific Industries*, Case No. 191133, Shasta County Superior Court, Hon. Tamara L. Wood (certifying eight classes for meal period violations, rest period violations, unpaid wages, unreimbursed business expenses, wage statement violations, and waiting time penalties); and
- *Aurora Gatica v. Valley Ag, Inc. et al.*, Case No. 19CECG03018, Fresno County Superior Court, Honorable Tyler D. Tharpe, presiding (certifying claims for meal period violations, rest period violations, wage statement violations, and waiting time penalties).

8. Of particular relevance to this case, I served as lead or co-lead counsel for the plaintiff and aggrieved employees in several PAGA-only settlements, including but not limited to:

- *Pentinio v. Southern Wine and Spirits of America, Inc.*, Case No. BC570234, California Superior Court, County of Los Angeles, Honorable Judge Maureen Duffy-Lewis, presiding, approved by the Court on January 19, 2016;
- *Resendez v. Bridgestone Retail Operations, LLC*, Case No. BC596892, California Superior Court, County of Los Angeles, Honorable Judge Marc Marmaro presiding, approved by the Court on June 13, 2016;
- *Canul v. Basmat, Inc.*, Case No. BC674940, California Superior Court, County of Los Angeles, Honorable Judge Teresa A. Beaudet presiding, approved by the Court on August 22, 2018;
- *Silva v. CitiStaff Solutions, Inc.*, Case No. BC620115, California Superior Court, County of Los Angeles, Honorable Judge David S. Cunningham III presiding, approved by the Court on November 19, 2018;
- *Cruz v. Fleetwash, Inc.*, Case No. 19STCV03033, California Superior Court, County of Los Angeles, Honorable Judge Stuart M. Rice presiding, approved by the Court on October 7, 2019; and
- *Ibarra v. Baker Commodities, Inc.*, Case No. 19STCV06148, California Superior Court, County of Los Angeles, Honorable Yolanda Orozco presiding, approved by the Court on September 30, 2020.

9. In 2015-2017, Thomson Reuters recognized me as a Top Young Attorney in Southern California in the annual Rising Stars Edition of Super Lawyer. This is an honor awarded to no more than two-and-a-half percent of attorneys under the age of forty in Southern California each year. In 2018-2023, Thomson Reuters recognized me as a “Super Lawyer” in the annual Super Lawyer magazine, an honor awarded to no more than five percent of all attorneys in Southern California each year.

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1 10. As co-counsel for Plaintiffs and the Aggrieved Employees, I have been intimately
2 involved in every aspect of this case from its inception through the present, and I believe that the
3 proposed Settlement is an excellent result for Aggrieved Employees and the State of California.
4 The details of the work completed in this case by me and the other attorneys in my firm are set
5 forth in the declaration of Sean M. Blakely filed concurrently herewith.

6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct. Executed on January 6, 2026, at El Segundo, California.

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Paul K. Haines