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Attorneys for Plaintiff CHRISTOPHER FRANCESCHI, and all others similarly situated
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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA CLARA

ANDREW TREJO BACA; CHRISTOPHER
FRANCESCHI, on behalf of themselves and
all others similarly situated, and the general
public,

Plaintiffs,

v.

AIRPORT APPLIANCE, INC., a California
corporation; AIRPORT HOME APPLIANCE,
a business entity of unknown form; and DOES
1 through 50, inclusive,

Defendants.

) Case No. 23CV421926

) [Assigned for all purposes to the Hon. Theodore
) C. Zayner, Dept. 19]

) **DECLARATION OF WALTER L. HAINES**
) **IN SUPPORT OF MOTION FOR**
) **PRELIMINARY APPROVAL OF CLASS**
) **ACTION SETTLEMENT**

) Date: July 30, 2025

) Time: 1:30 p.m.

) Dept: 19

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Attorneys for Plaintiff ANDREW TREJO BACA

I, Walter L. Haines, declare:

2. I make this Declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. I make this Declaration based on my personal knowledge and if called to testify I could and would competently testify to the matters contained in this Declaration.

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

6. In sum, I am well-suited to act as Class Counsel and will continue to vigorously represent the interests of the class.

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1 I declare under penalty of perjury under the laws of California that the foregoing is true
2 and correct. Executed on March 3, 2025, at Los Angeles, California.

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5 WALTER L. HAINES
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