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Attorneys for Plaintiffs ROSEMARY IGLESIAS, EVET RICO, and MARIA RICO, and all
others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ROSEMARY IGLESIAS, an individual;
EVET RICO, an individual; MARIA RICO, an
individual; on behalf of themselves and all
others similarly situated and the general
public,

Plaintiffs,

vs.

LAUNDRY PLANET, LLC, a California
limited liability company; SANTA FE
LAVANDERIA, LLC, a California limited
liability company; YOUR LAUNDRY
BUTLERS, LLC, a California limited liability
company; ART JAEGER, an individual; and
DOES 1 to 100, inclusive,

Defendants.

) Case No. 23STCV28632

) [Assigned for All Purposes to:
) The Hon. William F. Highberger, Dept. SS10]

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

) Date: January 21, 2026

) Time: 11:00 a.m.
) Dept: 10

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1. I am an attorney licensed to practice law in the State of California and am an attorney of record for the Plaintiffs herein. I am a member in good standing of the State Bar of California. 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.

3. I am a highly experienced class action attorney, with over 40 years of practice that includes extensive involvement in matters of this nature. I am the most senior attorney at my firm, United Employees Law Group, and I worked on the litigation of this matter. I formed United Employees Law Group in 2005, primarily to represent employees in their wage claims. I have represented over 1,500 clients in wage and hour disputes of which more than 300 cases were class actions with settlements totaling over \$400,000,000. These class action cases include Fortune 500 companies such as Pepsi, Intel, Home Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co., Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

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

6. I performed, among other things, the following tasks related to this matter:
analyzed initial clients' claims; performed initial investigation inclusive of research necessary
for case evaluation and searched court records relative to possible competing cases. I consulted

1 with co-counsel as to issues relating to the prosecution of this case, participated in its mediation
2 and settlement and reviewed all settlement papers along with orders from the court, law and
3 motion papers and assisted with client liaison and other tasks assigned by lead counsel.

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

6 8. The total number of hours spent by me on this litigation is 15.70 hours through
7 December 9, 2025. The hours billed are broken down as follows:

8 Intake and client signup: 6.50

9 Review documents and correspondence: 5.00

10 Review and edit MOU, settlement agreement and prelim approval: 3

11 Oversee admin and review and edit final approval: 1.20

12 Total Hours = 15.70

13 9. My involvement with the case was primarily in the very initial stages of vetting
14 the potential client, along with verification that there were no conflicting cases existing at that
15 time. During most of the litigation there was ongoing communications with co-counsel
16 discussing strategy and status of litigation.

17 10. My total lodestar amount through December 9, 2025, is \$11,382.50 (15.70 hours
18 @ \$725/hour).

19 11. No charges have been included for paralegal or staff time spent on this matter.

20 12. My out-of-pocket expenses for Case Anywhere fees through 11/30/2025 are
21 \$1079.96. I anticipate an additional \$49.00 will be due through December 31, 2025. My total
22 out of pocket expenses through December 31, 2025, will be \$1,128.96.

23 13. I believe that the Settlement is fair, adequate, and reasonable. The Settlement
24 provides substantial monetary benefits to Class Members and is a product of diligent efforts of
25 Class Counsel to obtain the best possible result for the Class Members. This Settlement was
26 reached following thorough legal and factual research and analysis, thorough review of
27 extensive data relative to the claims in the action, arduous settlement negotiations, and thorough
28

1 investigation of the underlying facts by the respective parties and review of records. The
2 settlement negotiations were, at all times, adversarial and non-collusive in nature. The proposed
3 Settlement is within the range of reasonableness, and Class Members have supported the
4 Settlement.

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

7 Executed on this 9th day of December 2025 in Los Angeles, California.

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10 
11 Walter L. Haines