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7 Attorneys for Plaintiff(s),

8 KEVIN LYNUM, and all others similarly situated

9 (Additional attorneys for Plaintiff(s) on following page)

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF MARIPOSA**

12 **(UNLIMITED JURISDICTION)**

13 KEVIN LYNUM, on behalf of himself and all
14 others similarly situated, and as an “aggrieved
15 employee” on behalf of other “aggrieved
16 employees” under the Labor Code Private
Attorneys General Act of 2004,

17 *Plaintiff(s),*

18 vs.

19 PROSPECT HOTEL SERVICES, LLC, a
20 Delaware limited liability company; PROSPECT
21 HOTEL MANAGEMENT LLC, a Delaware
22 limited liability company; and DOES 1–50,
inclusive,

23 *Defendant(s).*

Case No. 23-CVCV-0012034

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
KEVIN LYNUM’S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**



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I, WALTER L. HAINES, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for Plaintiff Kevin Lynam (“Plaintiff”) in his lawsuit against Defendants PROSPECT HOTEL SERVICES, LLC and PROSPECT HOTEL MANAGEMENT, LLC (collectively “Defendants”). I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiff’s 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.

2. I am a highly experienced class action counsel specializing in actions of this nature. I have been practicing law for over 40 years and I am highly experienced in actions of this nature. I am the most senior attorney at my firm, United Employees Law Group, and 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.

3. I have no conflicts of interest with the class or with the Class Representative. I am not related to the representative plaintiff. I have not previously represented Defendants in any matter. I do not represent opposing factions within the class in that all claims are predicated upon the same theories of liability and benefit all class members equally. In sum, I am well-suited to act as Class Counsel and will continue to vigorously represent the interests of the class.

I declare under the penalty of perjury of the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on Thursday, November 21, 2024 at Los Angeles, California.

WALTER L. HAINES,
Declarant



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