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Attorneys for Plaintiff Abdolla Kowighadoush,
on behalf of himself and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

ABDOLLA KOWIGHADOUSH, an individual,
on behalf of himself and others similarly
situated,

Plaintiff,

vs.

NKSFB, LLC, a Delaware limited liability
company; and DOES 1 through 50, inclusive.

Case No. 23STCV23689

Assigned To:
Dept.: 14

s

**DECLARATION OF WALTER HAINES
IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF PAGA
SETTLEMENT AGREEMENT**

Motion for PAGA Approval Hearing Date:
Hearing Date: October 29, 2025
Time: 11:00 a.m.
Department: 14

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I, Walter Haines, declare:

1. I am an attorney licensed to practice before all courts of the State of California. I am counsel of record for Plaintiff Abdolla Kowighadoush in this action. I make this Declaration in support of Plaintiff's Unopposed Motion for Approval of PAGA Representative 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. The Settlement Agreement in this action is the result of vigorous and competent representation of Plaintiff, and arms'-length, contentious negotiations with Defendant to reach the best possible outcome for the Labor and Workforce Development Agency ("LWDA") and the aggrieved employees. Based on my extensive experience as counsel in many class and representative action settlements, I believe that the proposed Settlement is fair, reasonable, and adequate to the LWDA and the aggrieved employees.

3. My firm is highly experienced in actions of this nature. I have been practicing law over 40 years and I am highly experienced in actions of this nature. I am the most senior attorney in my firm, United Employees Law Group, PC 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 complex class action cases include Fortune 500 companies such as Pepsi, Intel, Home Depot, Kaiser and Wells Fargo, Bank of America, Cisco Systems, First American Title Co., Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

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 Defendant.

5. United Employees Law Group has participated in this litigation and has performed work on behalf of Plaintiff since the inception of this litigation. The hours submitted with this

1 declaration are solely for work performed on behalf of the LWDA and aggrieved employees in the
2 above-titled California action and not any other state or federal matter.

3 6. I performed, among other things, the following general tasks related to this matter:
4 analyzed initial clients' claims; performed initial investigation inclusive of research necessary for
5 case evaluation and searched court records relative to possible competing cases; consulted with
6 co-counsel as to issues relating to the prosecution of this case; reviewed all settlement papers along
7 with orders from the court, law and motion papers; and assisted with client liaison and other tasks
8 assigned by lead counsel.

9 7. The hourly rate for my time is **\$725** per hour, which is my usual and customary
10 hourly rate charged for my services in similar class and representative action lawsuits.

11 8. The total number of hours spent by me on this litigation is 15.10 hours through
12 April 24, 2025, as categorized herein below:

- | | | |
|----|---|---------------------------|
| 13 | • Initial investigation case evaluation & court records search: | 6.50 hours |
| 14 | • Review pleadings, communications, mediation, settlement | |
| 15 | documents and various motions: | 8.60 hours |
| 16 | | |
| 17 | Total: | <u>15.10 hours</u> |

18 9. My total lodestar amount through April 24, 2025, is **\$10,947.50**.

19 10. I have no conflicts of interest with the aggrieved employees or with the named
20 Plaintiff. I am not related to the representative Plaintiff. I have not previously represented
21 Defendant in any matter. I do not represent opposing factions within the aggrieved employee group
22 in that all claims are predicated upon the same theories of liability and benefit all aggrieved
23 employees equally.

24 11. I believe that the Settlement is fair, adequate, and reasonable. The Settlement
25 provides substantial monetary benefits to the LWDA and aggrieved employees and is a product of
26 diligent efforts to obtain the best possible result for the LWDA and aggrieved employees. This
27 Settlement was reached following thorough legal and factual research and analysis, thorough
28

1 review of data relative to the claims in the action, arduous settlement negotiations, and thorough
2 investigation of the underlying facts by the respective parties and review of records. The settlement
3 negotiations were, at all times, adversarial and non-collusive in nature. In sum, I am well-suited to
4 act as counsel for Plaintiff and other aggrieved employees and will continue to vigorously
5 represent the interests of the LWDA and the aggrieved employees.

6 I declare under penalty of perjury under the laws of California and the United States of
7 America that the foregoing is true and correct to the best of my knowledge.

8 Executed this 24th day of April 2025 at Los Angeles, California.

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12 Walter L. Haines
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