

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Sean M. Blakely (SBN 264384)
sblakely@haineslawgroup.com
Joel M. Gordon (SBN 276490)
jgordon@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff

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

RUDY HERNANDEZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

ABLE SHEET METAL, INC. a California
corporation; and DOES 1 through 100,

Defendants.

Case No. 23STCV26056

*[Assigned to the Hon. Laura A. Seigle,
Dept. 17]*

**DECLARATION OF JOEL M. GORDON
IN SUPPORT OF PLAINTIFF'S
MOTION FOR APPROVAL OF
SETTLEMENT OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS'
GENERAL ACT AND REASONABLE
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT PAYMENT**

Date: May 21, 2025
Time: 9:00 a.m.
Dept.: 17

Complaint filed: October 24, 2023
Trial Date: None Set

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I, JOEL M. GORDON, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Rudy Hernandez (“Plaintiff”) in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I received a Bachelor of Arts degree from Washington University in St. Louis in 1997, and a Juris Doctor from the University Southern California in 2011. I was admitted to the California State Bar in November 2011. During law school, I externed for the Honorable Gregory W. Alarcon in the Los Angeles Superior Court and for the Federal Trade Commission in Los Angeles, where I assisted in the prosecution of civil fraud actions on behalf of consumers.

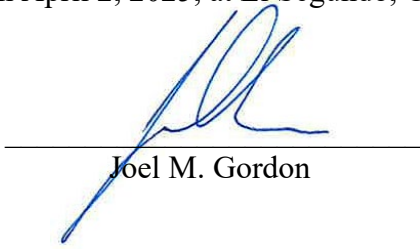
3. After graduating from law school, I worked for Kiesel Law, LLP, a plaintiff-side personal injury, mass tort, and consumer class action firm, from April 2013 until April 2016. From April 2016 until February 2020, I worked as an associate at the plaintiff's-side litigation firm, Cotchett Pitre & McCarthy LLP, representing plaintiffs in product liability, consumer and healthcare fraud, mass tort, and personal injury cases. From February 2020 until July 2023, I worked as an associate at the plaintiff's-side employment firm, Marlin & Saltzman LLP, representing employees in class wage-and-hour actions and PAGA actions against employers. Although non-exhaustive, the types of work I performed at these firms included: conducting client intakes; performing pre-filing research and analysis; drafting complaints; attending court hearings; corresponding with opposing counsel; drafting and responding to written discovery; preparing for and taking and defending depositions; analyzing payroll and timekeeping records and employee handbooks; drafting and opposing a variety of motions including motions for summary judgment, motions for remand, demurrers and motions to dismiss, motions to compel, and motions for certification; drafting mediation briefs and attending mediations; drafting long-form settlement agreements; and drafting motions for preliminary and final settlement approval.

4. Since July 2023, I have worked as an associate at my current firm, Haines Law

1 Group, APC. I am currently staffed on approximately forty (40) active wage and hour class actions
2 in which I play a significant role.

3 5. As counsel for Plaintiff, I have been closely involved in all aspects of this
4 litigation, including such tasks as: corresponding with opposing counsel; analyzing payroll and
5 timekeeping records and employee handbooks; drafting the mediation brief and attending
6 mediation; drafting the long-form settlement agreement; and drafting the motion for approval.
7 The details of the work completed by Class Counsel in this case are set forth in the declaration of
8 Sean M. Blakely, filed concurrently herewith.

9 I declare under penalty of perjury under the laws of California and the United States that
10 the foregoing is true and correct. Executed on April 2, 2025, at El Segundo, California.

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Joel M. Gordon