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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA**

ERIC PRADO, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

WILWOOD ENGINEERING, a California
Corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 2023CUOE015773

*[Assigned for all purposes to the Hon. Benjamin
F. Coats, Dept. 43]*

**DECLARATION OF PAUL K. HAINES IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA ACTION
SETTLEMENT**

Date: October 29, 2024

Time: 8:35 a.m.

Dept.: 43

Action Filed: October 24, 2023

Trial Date: None Set

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I, PAUL K. HAINES, declare as follows:

1. I am a shareholder and principal of the law firm Haines Law Group, APC, and counsel for the named Plaintiff Eric Prado (“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 am a 2006 graduate of Pepperdine University School of Law, where I graduated *cum laude*. During law school, I worked as a law clerk for the appellate firm of Horvitz & Levy, located in Encino, California. I also spent a semester in law school working as an extern for the Honorable Edward Rafeedie, District Judge for the United States District Court for the Central District of California.

3. Since graduating from law school, my practice focused almost exclusively on employment litigation. In September 2007, I began working as an associate attorney at the international law firm of Littler Mendelson P.C., at its Los Angeles office, which according to its website is the “largest U.S.-based law firm exclusively devoted to representing management in every aspect of labor and employment law.” While at Littler Mendelson, I was primarily staffed on wage and hour class actions in both state and federal courts, and I also worked on a number of single and multi-plaintiff wage and hour matters as well.

4. During my employment at Littler Mendelson, I played a significant role in the class actions that I was staffed on, as I was often the only associate staffed on such cases. In particular, I received a wide array of wage and hour class action experience performing the following types of tasks: drafting demurrers and motions to strike and/or dismiss; removing actions from state court to federal court; drafting and responding to written discovery; drafting and opposing discovery related motions; arguing discovery related motions; drafting motions to consolidate related matters; interviewing putative class members and obtaining declarations in connection with class certification; drafting oppositions to motions for class certification; drafting motions for decertification following class certification; conducting exposure analyses to assess

1 the strengths and weaknesses of asserted claims, the likelihood of prevailing at class certification,
2 and potential damages resulting from such claims; drafting mediation briefs; serving as the
3 primary contact to in-house counsel; deposing named plaintiffs and putative class members;
4 deposing retained expert witnesses; and defending the depositions of corporate witnesses. In
5 short, I played an integral role in all aspects of litigation from the inception of a matter through
6 and beyond class certification. I also supervised the work of several junior attorneys who were
7 staffed on the same wage and hour class actions.

8 5. In June 2011, I voluntarily resigned from Littler Mendelson in order to accept an
9 associate attorney position with the international law firm of Morgan, Lewis & Bockius LLP, at
10 its Los Angeles office, where I began working in July 2011. During my employment at Morgan,
11 Lewis & Bockius, I worked exclusively on the defense of wage and hour class and collective
12 actions. For the majority of cases that I worked on, I was the only associate staffed on the case,
13 and I performed the same job duties as described in the immediately preceding paragraph. In
14 addition to working on wage and hour class actions, at Morgan, Lewis & Bockius I also worked
15 on a number of “hybrid” actions asserting nationwide wage and hour claims under the Fair Labor
16 Standards Act, as well as California-specific claims under Rule 23 of the Rules of Civil Procedure.

17 6. In July 2012, I transitioned into litigating wage and hour class actions from the
18 Plaintiff’s side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since
19 February 2016 as a Shareholder of Haines Law Group, APC. Currently, over ninety percent (90%)
20 of my practice is dedicated exclusively to the prosecution of wage and hour class actions, and my
21 law firm is currently responsible for prosecuting over fifty (50) wage and hour class actions filed
22 in both State and Federal courts throughout California.

23 7. I have also moved to certify and have received an order certifying a class action
24 and/or conditionally certifying a collective action in the following cases:

- 25 • *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-
26 CXC, California Superior Court, County of Orange, Honorable Judge Gail A. Andler,
27 presiding (certifying a class of employees who were misclassified as independent
28 contractors);

- 1 • *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United
2 States District Court, Central District of California, Honorable Judge Beverly Reid
3 O’Connell, presiding (conditionally certifying an unpaid FLSA overtime wage class);
- 4 • *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States
5 District Court, Central District of California, Honorable Judge John F. Walter, presiding
6 (certifying a rest period violation class and conditionally certifying a FLSA unpaid
7 overtime wage class);
- 8 • *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court,
9 Northern District of California, Honorable Judge Haywood S. Gilliam, Jr., presiding
10 (conditionally certifying an unpaid FLSA overtime wage class);
- 11 • *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States
12 District Court, Eastern District of California, Honorable Jennifer L. Thurston, presiding
13 (conditionally certifying an unpaid FLSA overtime wage class);
- 14 • *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC,
15 California Superior Court, County of Orange, Honorable Judge William Claster, presiding
16 (certifying unpaid overtime wage class and waiting time penalty class);
- 17 • *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-775372-CU-OE-CXC,
18 California Superior Court, County of Orange, Honorable Glenda Sanders, presiding
19 (certifying piece rate pay plan classes, expense reimbursement class, wage statement
20 class, and waiting time penalties class);
- 21 • *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United
22 States District Court, Central District of California, Honorable Dolly M. Gee presiding
23 (certifying six classes of employees for rest period violations, wage statement violations,
24 meal period violations, and overtime and double-time violations);
- 25 • *Vasquez v. Kraft Heinz Foods Company*, Case No. 16-cv-2749-WQH-BLM, United States
26 District Court, Southern District of California, Honorable William Q. Hayes presiding
27 (certifying classes for automatic meal period deductions, manual time deductions, late
28 meal periods, and derivative wage statement and waiting time penalties);

- 1 • *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA,
2 United States District Court, Northern District of California, Honorable William H. Alsup
3 presiding (certifying three classes of employees for unlawful wage deduction violations,
4 wage statement violations, and waiting time violations);
- 5 • *Barbara J. Bowlin-Burdick v. Life Care Centers of America, Inc.*, Case No. BC657139,
6 Los Angeles County Superior Court, Honorable Maren E. Nelson, presiding (certifying
7 classes for late meal period violations, on-remises rest period violations, wage statement
8 violations, and waiting time violations);
- 9 • *Staublein v. Wells Fargo Bank, National Association*, Case No. CIVDS1712267, San
10 Bernardino County Superior Court, Honorable David Cohn, presiding (certifying a wage
11 statement class);
- 12 • *Danica N. Keich, et al. v. U.S. Healthworks, Inc., et al.*, Case No. 37-2017-00015343-CU-
13 OE-CTL, San Diego County Superior Court, Honorable Eddie C. Sturgeon, presiding
14 (certifying classes for rest period violations, meal period violations, on-call pay violations,
15 wage statement violations, and waiting time violations);
- 16 • *George Gomez v. The Bedrock Company*, Case No. CIVDS1824255, San Bernardino
17 County Superior Court, Honorable David Cohn, presiding (certifying claims for unpaid
18 overtime and minimum wage violations, meal period violations, rest period violations,
19 wage statement violations, and waiting time penalties); and
- 20 • *Aurora Gatica v. Valley Ag, Inc. et al.*, Case No. 19CECG03018, Fresno County Superior
21 Court, Honorable Tyler D. Tharpe, presiding (certifying claims for meal period violations,
22 unpaid rest period violations, wage statement violations, and waiting time penalties).

23 8. I have been appointed as Class Counsel in hundreds of wage and hour class action
24 settlements in state and federal courts within California, and my law firm has recovered in excess
25 of \$500 million dollars on behalf of our clients. A few examples of the matters in which I have
26 recently been appointed as Class Counsel, all of which have been granted final approval, include
27 the following: *Steve Qawas v. Socal Framing, Inc.*, Case No RIC1902588, Riverside County
28 Superior Court, Honorable Sunshine S. Sykes, presiding (approving an hourly rate of \$675 for

work performed in 2019-2022); *Jessica Burrola v. Trademark Cosmetics, Inc.*, Case No. RIC2002311, Riverside County Superior Court, Honorable Sunshine S. Sykes, presiding (approving an hourly rate of \$675 for work performed in 2020-2022); *Elmy Calderon v. Personnel Staffing Group, LLC*, Case No. VCU278910, Tulare County Superior Court, Honorable David C. Mathias, presiding (approving an hourly rate of \$675 for work performed in 2019-2022); *Santos Orellana v. Smarte Carte, Inc.*, Case No. 20STCV08890, Los Angeles County Superior Court, Honorable Yvette M. Palazuelos, presiding (approving an hourly rate of \$675 for work performed in 2020-2022); *Luis Montanez v. MEI Rigging & Crating, LLC, et al.*, Case No. 21STCV04062, Los Angeles County Superior Court, Honorable Carolyn B. Kuhl, presiding (approving an hourly rate of \$675 for work performed in 2021-2022); *Ketema Nelson v. Santini Foods, Inc.*, Case No. RG21090890, Alameda County Superior Court, Honorable Evelio Grillo, presiding (approving an hourly rate of \$675 for work performed in 2021-2022); *Edward Salgado v. S.R. Bray LLC, dba Power Plus!, et al.*, Case No. 30-2020-01172134-CU-OE-CXC, Orange County Superior Court, Honorable Lon F. Hurwitz, presiding (approving an hourly rate of \$750 for work performed in 2020-2023); *Santiago Gutierrez v. M.M.C.L., Inc. dba California Landcare*, Case No. 30-2021-01182371-CU-OE-CXC, Honorable Randall J. Sherman, presiding (approving an hourly rate of \$750 for work performed in 2021-2023); *Robert Lewis v. IMERYS Filtration Minerals, Inc., et al.*, Case No. 22CV02874, Santa Barbara County Superior Court, Honorable Jed Beebe, presiding (approving an hourly rate of \$750 for work performed in 2021-2023); *Gerardo Sanchez v. Dutton Home Services, LLC*, Case No. 22STCV01834, Los Angeles County Superior Court, Honorable Maren E. Nelson, presiding (approving an hourly rate of \$750 for work performed from 2022-2023); *Roberto Arcos, et al. v. Panoramic Doors, LLC*, Case No. 37-2021-00048823-CU-OE-CTL, San Diego County Superior Court, Honorable Loren G. Freestone, presiding (approving an hourly rate of \$850 for work performed in 2021-2023); *Olivia Rose Ramirez, et al. v. Wyndham Vacation Ownership, Inc.*, Case No. 20CV01715, Santa Barbara County Superior Court, Honorable James F. Rigali, presiding (approving an hourly rate of \$850 for work performed in 2020-2024); and *Aaron Hallum, et al. v. FCA US, LLC*, Case No. CIVDS1936782, San

1 Bernardino County Superior Court, Honorable Joseph T. Ortiz, presiding (approving an hourly
2 rate of \$850 for work performed in 2021-2024).

3 9. In approximately 2018, I was selected to be a member of the Los Angeles Superior
4 Court, Complex Civil Department Ad Hoc Wage and Hour Committee, which was chaired by the
5 Honorable Judge Amy D. Hogue and Honorable Judge David S. Cunningham. The committee
6 was comprised of 8 plaintiff's attorneys and 8 defense attorneys, and was consulted for
7 recommendations regarding wage and hour class action cases, including preparing model class
8 action and PAGA action settlement agreements which are now publicly available at
9 <http://www.lacourt.org/forms/all>.

10 10. In April 2019, I served as trial counsel for the Plaintiff in the matter of *Calhoun v.*
11 *Aqua Tech Water Management Inc.*, Case No. BS169815, Los Angeles County Superior Court,
12 Honorable Theresa M. Traber presiding, which was an individual wage-and-hour case that
13 resulted in a six-figure verdict in favor of Plaintiff. I was subsequently awarded attorney's fees at
14 my requested rate of \$650 per hour in 2020.

15 11. In every year from 2015 through 2017, Thomson Reuters recognized me as a Top
16 Young Attorney in Southern California in the annual Rising Stars Edition of Super Lawyer. This
17 is an honor awarded to no more than two-and-a-half percent of attorneys under the age of forty in
18 Southern California each year. In every year from 2018 through 2024, Thomson Reuters
19 recognized me as a "Super Lawyer" in the annual Super Lawyer magazine, an honor awarded to
20 no more than five percent of all attorneys in Southern California each year.

21 12. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation
22 since its inception. The details of the work completed by Class Counsel in this case are set forth
23 in the declaration of Andrew J. Rowbotham, filed concurrently herewith.

24 13. I confirm that I do not have any interest or involvement in, and am not affiliated
25 with, the proposed settlement administrator, CPT Group, Inc.

26 I declare under penalty of perjury under the laws of California and the United States that
27 the foregoing is true and correct. Executed on October 7, 2024, at El Segundo, California.

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Paul K. Haines