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Attorneys for Plaintiff MICHAEL INGRAM, on behalf of himself and other aggrieved employees

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

MICHAEL INGRAM, an individual; on behalf
of himself and other aggrieved employees,

Plaintiffs,

vs.

MP MINE OPERATIONS, LLC, a Nevada
corporation; and DOES 1 through 100,
inclusive,

Defendants.

) Case No. CIVSB2405115

) [Assigned For All Purposes To: Hon. David
) E. Driscoll, Dept. S22]

) **DECLARATION OF WALTER L.
) HAINES IN SUPPORT OF MOTION TO
) APPROVE PAGA SETTLEMENT**

) Date: May 1, 2025

) Time: 8:30 a.m.

) Dept.: S22

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1 6. United Employees Law Group has participated in this litigation and has
2 performed work on behalf of Plaintiff since the inception of this litigation. The hours submitted
3 with this declaration are solely for work performed on behalf of the PAGA Members alleged in
4 the above-entitled California action and not any other state or federal matter.

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

11 8. The hourly rate for my time is \$725 per hour, which is my usual and customary
12 hourly rate charged for my services in similar complex class and representative actions.

13 9. The total number of hours spent by me on this litigation is 12.70 hours through
14 February 19, 2025.

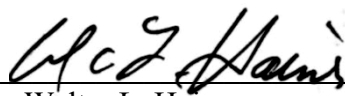
15 10. My total lodestar amount through February 19, 2025, is 9,207.50.

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

17 12. My out of pocket expenses for postage are 1.19. My total out of pocket expenses
18 are \$1.19.

19 13. I believe that the Settlement is fair, adequate, and reasonable. The Settlement
20 provides substantial monetary benefits to PAGA Members and is a product of diligent efforts of
21 Plaintiff's Counsel to obtain the best possible result for the PAGA Members. This Settlement
22 was reached following thorough legal and factual research and analysis, thorough review of
23 extensive data relative to the claims in the action, arduous settlement negotiations, and thorough
24 investigation of the underlying facts by the respective parties and review of records. The
25 settlement negotiations were, at all times, adversarial and non-collusive in nature. The proposed
26 Settlement is within the range of reasonableness, and PAGA Members have supported the
27 Settlement.
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1 I declare under penalty of perjury under the laws of the United States and California that
2 the foregoing is true and correct. Executed on February 19, 2025, at Los Angeles, California.

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5 Walter L. Haines,
6 Declarant
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