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Attorneys for Plaintiff

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

GUDELIA CRUZ, as an individual and on  
behalf of all other aggrieved employees,

Plaintiff,

vs.

REITER BROTHERS, INC., a California  
corporation; and DOES 1 through 100,

Defendants.

Case No. 2024CUOE019469

*[Assigned to the Hon. Charmaine H. Buehner,  
Dept. J4]*

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

Date: August 18, 2025

Time: 8:30 a.m.

Dept.: J4

Complaint filed: January 16, 2024

Trial Date: None Set

1 I, JOEL M. GORDON, declare as follows:

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

7 2. I received a Bachelor of Arts degree from Washington University in St. Louis in  
8 1997, and a Juris Doctor from the University Southern California in 2011. I was admitted to the  
9 California State Bar in November 2011. During law school, I externed for the Honorable Gregory  
10 W. Alarcon in the Los Angeles Superior Court and for the Federal Trade Commission in Los  
11 Angeles, where I assisted in the prosecution of civil fraud actions on behalf of consumers.

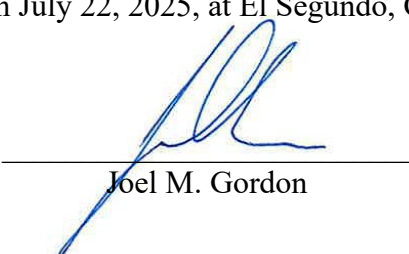
12 3. After graduating from law school, I worked for Kiesel Law, LLP, a plaintiff-side  
13 personal injury, mass tort, and consumer class action firm, from April 2013 until April 2016.  
14 From April 2016 until February 2020, I worked as an associate at the plaintiff’s-side litigation  
15 firm, Cotchett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

27 4. Since July 2023, I have worked as an associate at my current firm, Haines Law  
28 Group, APC. I am currently staffed on approximately forty (40) active wage and hour class actions

1 in which I play a significant role.

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

8 I declare under penalty of perjury under the laws of California and the United States that  
9 the foregoing is true and correct. Executed on July 22, 2025, at El Segundo, California.

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Joel M. Gordon