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Attorneys for Plaintiffs

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

PAUL MACIAS and JULIANNA PADILLA,
as individuals, on behalf of themselves and all
other aggrieved employees,

Plaintiffs,

vs.

TEAM CAR CARE, LLC, a Delaware limited
liability company, TEAM CAR CARE WEST,
LLC, a Delaware limited liability company,
and DOES 2 through 100,

Defendants.

CASE NO. 24STCV03864

*[Case assigned for all purposes to the Hon.
Steve Cochran, Dept. 16]*

**DECLARATION OF IAN T. MALLERY
IN SUPPORT OF PLAINTIFFS'
MOTION FOR SETTLEMENT
APPROVAL OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT, REASONABLE
ATTORNEYS' FEES AND COSTS,
AND REPRESENTATIVE
ENHANCEMENT PAYMENTS**

Date: December 11, 2025
Time: 9:00 a.m.
Dept: 16

Action Filed: February 15, 2024
Trial Date: None Set

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I, IAN T. MALLERY, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiffs Paul Macias and Julianna Padilla (“Plaintiffs”) 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 2021, and a Juris Doctor from the University of Minnesota Law School in 2024. I was admitted to the California State Bar in December 2024.

3. During law school, I served as Student Director of the University of Minnesota Clemency Project Clinic and was selected as a Human Rights Fellow with the University of Minnesota Human Rights Center.

4. Prior to and during law school I interned and clerked for the American Civil Liberties Union of Missouri, where I worked on individual civil rights litigation cases, including drafting complaints, memoranda, and briefs on substantive litigation issues. I also participated in a year-long internship with the National Labor Relations Board – Region 18, where I investigated unfair labor practices charges, negotiated settlements, drafted memoranda, and issued complaints on behalf of the General Counsel. I have worked as an associate at Haines Law Group, APC since being sworn into the California State Bar in December 2024.

5. Although non-exhaustive, the types of tasks I have performed include: conducting client intakes, drafting complaints, attending court hearings in state and federal administrative courts, corresponding with opposing counsel, drafting and responding to written discovery, drafting and opposing a variety of motions including motions for summary judgment, drafting mediation briefs, attending mandatory settlement conferences, drafting long-form settlement agreements, and drafting motions for preliminary and final settlement approval.

6. The following is a non-exhaustive list of the class action settlements in which I played a major role assisting Class Counsel, and which have been granted final approval: *Raul*

1 *Camacho v. Residential Fire Systems, Inc.* Case No. 30-2015-775372-CU-OE-CXC, Orange
2 County Superior Court; *Ruben Hernandez v. Neovia Logistics Services, LLC*, Case No.
3 CIVSB2305867, San Bernardino County Superior Court; *Juan David Arreola Carillo v. KPS*
4 *Global, LLC*, Case No. 22STCV19527, Los Angeles County Superior Court; and *Eric Prado v.*
5 *Wilwood Engineering*, Case No. 2023CUOE015773, Ventura County Superior Court.

6 7. As counsel for Plaintiffs, I have been closely involved in all aspects of this
7 litigation since its inception. The details of the work completed by Plaintiffs' Counsel in this case
8 are set forth in the declaration of Matthew K. Moen, filed concurrently herewith.

9 8. I confirm that I do not have any interest or involvement in, and am not affiliated
10 with, the proposed settlement administrator, Apex Class Action Administration.

11 I declare under penalty of perjury under the laws of the United States and the state of
12 California that the foregoing is true and correct. Executed on August 15, 2025, at El Segundo,
13 California.

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16 Ian T. Mallery
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