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IEASHA PETERS, individually and on behalf of
others similarly situated, and JIMMY QUEVEDO,
individually, on behalf of others similarly situated
and aggrieved employees pursuant to the California
Private Attorneys General Act

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

BRITTNI AGHEDO and IEASHA PETERS,
individually and on behalf of others similarly
situated, and JIMMY QUEVEDO, individually,
on behalf of others similarly situated and
aggrieved employees pursuant to the California
Private Attorneys General Act

Plaintiff,

vs.

VILLA ESPERANZA SERVICES, a California
501(c)(3) non-profit organization; and DOES 1
through 25, inclusive,

Defendants.

Case No. 23STCV27362

*Assigned for All Purposes to the Honorable
Carolyn B. Kuhl, Dept. SS-12*

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

Date: July 2, 2025
Time: 10:00 a.m.
Dept.: SS-12

Complaint Filed: November 6, 2023
Trial Date: Not Set

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7 IEASHA PETERS, individually and on behalf of
others similarly situated, and JIMMY QUEVEDO,
8 individually, on behalf of others similarly situated
and aggrieved employees pursuant to the California
9 Private Attorneys General Act

1 I, PAUL K. HAINES, declare as follows:

2 1. I am a shareholder and principal of Haines Law Group, APC, and counsel for the named
3 Plaintiff Jimmy Quevedo ("Plaintiff") and the proposed Settlement Class in the above-captioned
4 matter. I am a member in good standing of the bar of the State of California and am admitted to
5 practice 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 am a 2006 graduate of Pepperdine University School of Law, where I graduated cum
8 laude. During law school, I worked as a law clerk for the appellate firm of Horvitz & Levy, located in
9 Encino, California. I also spent a semester in law school working as an extern for the Honorable
10 Edward Rafeedie, District Judge for the United States District Court for the Central District of
11 California.

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

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

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

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

15 6. In July 2012, I transitioned into litigating wage and hour class actions from the
16 Plaintiff’s side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since
17 February 2016, as a Shareholder of the Haines Law Group, APC. Currently, over ninety percent (90%)
18 of my practice is dedicated exclusively to the prosecution of wage and hour class actions, and I am
19 currently responsible for prosecuting over fifty (50) wage and hour class actions filed in both State
20 and Federal courts throughout California. I have been appointed as Class Counsel in hundreds of wage
21 and hour class action settlements in state and federal courts within California. A few examples of the
22 matters in which I have been appointed as Class Counsel, all of which have been granted final
23 approval, include the following: *Sanchez v. Res-Care, Inc.*, Case No. BC526175, California Superior
24 Court, County of Los Angeles, Hon. John Shepard Wiley, Jr., presiding; *Prado v. Warehouse Demo*
25 *Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States District Court, Central District of
26 California, Hon. John F. Walter presiding; *Tesla Motors Wage and Hour Litigation*, JCCP 4792,
27 California Superior Court, Santa Clara County, Hon. Peter H. Kirwan presiding; *Bower v. Cycle Gear,*
28 *Inc.*, Case No. CV14-2712 HSG, United States District Court, Northern District of California, Hon.

Haywood S. Gilliam, Jr. presiding; *Longstreth v. PAQ, Inc., dba Food 4 Less*, Case No. 15CV-0206, California Superior Court, County of San Luis Obispo, Hon. Charles S. Crandall presiding; *Nunez v. CompuCom Systems, Inc.*, Case No. BC618385, California Superior Court, County of Los Angeles, Hon. John Shepard Wiley, Jr. presiding; *Mansilla v. Haeco Americas Line Services, LLC, et al*, Case No. BC615310, Superior Court of California, County of Los Angeles, Hon. Elihu M. Berle presiding; *Leverage, et al v. Traeger Pellet Grills, LLC, et al*, Case No. 4:16-cv-00784-KAW, United States District Court, Northern District of California, Hon. Kandis A. Westmore presiding.

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

- *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge Gail A. Andler, presiding (certifying a class of employees who were misclassified as independent contractors);
- *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United States District Court, Central District of California, Honorable Judge Beverly Reid O'Connell, presiding (conditionally certifying an unpaid FLSA overtime wage class);
- *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States District Court, Central District of California, Honorable Judge John F. Walter, presiding (certifying a rest period violation class and conditionally certifying an FLSA unpaid overtime wage class);
- *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court, Northern District of California, Honorable Judge Haywood S. Gilliam, Jr., presiding (conditionally certifying an unpaid FLSA overtime wage class);
- *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States District Court, Eastern District of California, Honorable Jennifer L. Thurston, presiding (conditionally certifying an unpaid FLSA overtime wage class);
- *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge William Claster, presiding (certifying unpaid overtime wage class and waiting time penalty class);

- 1 • *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-775372-CU-OE-CXC,
2 California Superior Court, County of Orange, Honorable Glenda Sanders, presiding (certifying
3 piece rate pay plan classes, expense reimbursement class, wage statement class, and waiting
4 time penalties class);
- 5 • *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United
6 States District Court, Central District of California, Honorable Dolly M. Gee presiding
7 (certifying six classes of employees for rest period violations, wage statement violations, meal
8 period violations, and overtime and double-time violations);
- 9 • *Vazquez, et al v. Kraft Heinz Foods Company*, Case No. 16-cv-2749-WQH-BLM, United
10 States District Court, Southern District of California, Honorable William Q. Hayes presiding
11 (certifying six classes of employees for unpaid wages, meal period violations, wage statement
12 violations, and waiting time penalties);
- 13 • *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA,
14 United States District Court, Northern District of California, Honorable William H. Alsup
15 presiding (certifying three classes of employees for unlawful wage deduction violations, wage
16 statement violations, and waiting time violations);
- 17 • *Staublein v. Wells Fargo Bank*, No. CIVDS1712267, San Bernardino County Superior Court,
18 Honorable David S. Cohn presiding (certifying wage statement class);
- 19 • *Perez v. Sunbelt Rentals, Inc.* Case No. 37-2018-00026405-CU-OE-CTL, California Superior
20 Court, County of San Diego, Honorable Eddie C. Sturgeon presiding (certifying class of
21 employees for wage statement violations);
- 22 • *Bowlin-Burdick, et al v. Life Care Centers of America, Inc.*, Case No. BC657139, Los Angeles
23 County Superior Court, Honorable Maren E. Nelson presiding (certifying four classes for meal
24 period violations, rest period violations, wage statement violations, and waiting time
25 penalties);
- 26 • *McDonald, et al. v. Sierra Pacific Industries*, Case No. 191133, Shasta County Superior Court,
27 Hon. Tamara L. Wood (certifying eight classes for meal period violations, rest period
28 violations, unpaid wages, unreimbursed business expenses, wage statement violations, and

waiting time penalties);

- *Danica N. Keich, et al. v. U.S. Healthworks, Inc., et al.*, Case No. 37-2017-00015343-CU-OE-CTL, San Diego County Superior Court, Honorable Eddie C. Sturgeon, presiding (certifying classes for rest period violations, meal period violations, on-call pay violations, wage statement violations, and waiting time violations);
- *George Gomez v. The Bedrock Company*, Case No. CIVDS1824255, San Bernardino County Superior Court, Honorable David Cohn, presiding (certifying claims for unpaid overtime and minimum wage violations, meal period violations, rest period violations, wage statement violations, and waiting time penalties); and
- *Aurora Gatica v. Valley Ag, Inc. et al.*, Case No. 19CECG03018, Fresno County Superior Court, Honorable Tyler D. Tharpe, presiding (certifying claims for meal period violations, rest period violations, wage statement violations, and waiting time penalties).

8. In 2015, 2016, and 2017, Thomson Reuters recognized me as a Top Young Attorney in Southern California in the annual Rising Stars Edition of Super Lawyer. This is an honor awarded to no more than two-and-a-half percent of attorneys under the age of forty in Southern California each year. In 2018, 2019, 2020, and 2021, Thomson Reuters recognized me as a “Super Lawyer” in the annual Super Lawyer magazine, an honor awarded to no more than five percent of all attorneys in Southern California each year.

9. As co-counsel for Plaintiffs and the proposed Settlement Class, I have been intimately involved in every aspect of this case, and I believe that the proposed Settlement is a favorable result for the Settlement Class.

10. On February 21, 2024, Plaintiff Jimmy Quevedo, through my office, filed a class action lawsuit entitled *Jimmy Quevedo v. Villa Esperanza Services*, Los Angeles Superior Court Case No. 24STCV04374 (the “*Quevedo Action*”). The *Quevedo Action* alleges causes of action for meal period violations, rest period violations, wage statement violations, and unfair competition.

11. After the filing of the *Quevedo Action*, I was informed that there was another pending wage and hour class action pending against Defendant in the matter entitled *Brittini Aghedo, et al. v. Villa Esperanza Services*, Los Angeles Superior Court Case No. 23STCV27362 (“*Aghedo Action*”).

1 On July 18, 2024, the Court related the *Aghedo* Action and *Quevedo* Action and designated the *Aghedo*
2 Action the lead case. Both cases are assigned to Department 12 at the Spring Street Courthouse for all
3 purposes.

4 12. On August 13 2024, all Parties participated in an all-day global mediation with Marc
5 Feder to resolve the *Quevedo* Action and the *Aghedo* Action. The Parties did not reach a settlement at
6 mediation, however, through continued negotiations through Mr. Feder, the Parties ultimately reached
7 a global class-wide settlement of the *Quevedo* Action and the *Aghedo* Action.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct. Executed on March 11, 2025, at El Segundo, California.

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12 Paul K. Haines
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