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Attorneys for Plaintiff

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

MARICELA MORALES VIDAL, as an
individual and on behalf of all others similarly
situated,

Plaintiff,

vs.

SZNW HOSPITALITY LLC, a California
limited liability company; SHEN ZHEN
NEW WORLD II, LLC, a California limited
liability company; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 24STCV03495

*[Assigned to the Hon. Laura Seigle, Dept.
SSC-17]*

**DECLARATION OF LIAM A. HALL IN
SUPPORT OF PLAINTIFF'S MOTION
FOR APPROVAL OF SETTLEMENT OF
CLAIMS BROUGHT UNDER THE
PRIVATE ATTORNEYS' GENERAL
ACT, REASONABLE ATTORNEYS'
FEES, COSTS, AND PAGA
REPRESENTATIVE ENHANCEMENT
PAYMENT**

Date: August 28, 2026

Time: 9:00 a.m.

Dept.: SSC-17

Complaint filed: February 9, 2024

Trial Date: None Set

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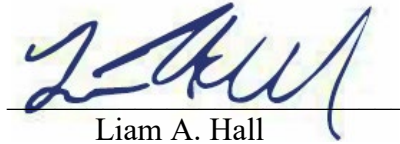
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1 responding to written discovery, drafting and opposing a variety of motions including motions
2 for summary judgment, drafting mediation briefs, attending meditation sessions, drafting long-
3 form settlement agreements, and drafting settlement approval papers.

4 6. The following is a non-exhaustive list of the PAGA settlements in which I played
5 a major role assisting PAGA Counsel, and which have been granted approval: *Edward R. Juarez*
6 *v. Fairway Staffing Services, et al.*, Case No. CIVSB2321349, San Bernardino County Superior
7 Court and *Carlos Zavala, et al. v. Paso Robles Tank, Inc.*, Case No. 24STCV03493, Los Angeles
8 County Superior Court.

9 7. As counsel for Plaintiff and the Aggrieved Employees, I have been intimately
10 involved in every aspect of this case, and I believe that the proposed Settlement is an excellent
11 result for Aggrieved Employees and the State of California. The details of the work completed in
12 this case by me and the other attorneys in my firm are set forth in the declaration of Sean M.
13 Blakely filed concurrently herewith.

14 I declare under penalty of perjury under the laws of California and the United States that
15 the foregoing is true and correct. Executed on July 22, 2026, at El Segundo, California.

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18 Liam A. Hall