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[Additional Counsel on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

JESUS RODRIGUEZ, JULIA GONZALES, and ERIKA BRITO, on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

PMC SOUTHWEST LLC, a limited liability company; THE ARCTICOM GROUP, LLC, a limited liability company; THE ARCTICOM GROUP REFRIGERATION, LLC, a limited liability company and DOES 1 through 50, inclusive,

Defendants.

CASE NO. CIVSB2409006

Assigned for all purposes to:
Hon. Winston Keh, Dept. S37

DECLARATION OF WALTER L. HAINES IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Date: December 11, 2026
Time: 8:30 a.m.
Dept: S37

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Attorneys for Plaintiffs JULIA GONZALES and ERIKA BRITO

DECLARATION OF WALTER L. HAINES

I, Walter L. Haines, declare:

1. I am an attorney licensed to practice law in the State of California and am an attorney of record for the Plaintiffs herein. I am a member in good standing of the State Bar of California. I make this Declaration based on my personal knowledge and if called to testify I could and would competently testify to the matters contained in this Declaration.

2. I make this Declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement.

3. I am a highly experienced class action attorney, with over 40 years of practice that includes extensive involvement in matters of this nature. I am the most senior attorney at my firm, United Employees Law Group, and I worked on the litigation of this matter. I formed United Employees Law Group in 2005, primarily to represent employees in their wage claims. I have represented over 1,500 clients in wage and hour disputes of which more than 300 cases were class actions with settlements totaling over $400,000,000. These class action cases include Fortune 500 companies such as Pepsi, Intel, Home Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems, First American Title Co., Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser Foundation Hospitals.

ATTORNEY COMPETENCE IN CLASS ACTIONS

4. Some of the class action litigation on which I have served as Class Counsel include:

a. *Abdolla Kowighadoush v. NKSFB, LLC*
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 23STCV23689)
Final Approval Granted on January 14 2026 (Hon. Timothy Patrick Dillon)

b. *Juan Fernandez v. Elite Lighting, dba Elite Lighting Corp.*
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 23STCV12044)
Final Approval Granted on August 05 2025 (Hon. Laura A. Seigle)

c. *Andrew Trejo Baca; Christopher Franceschi v. Airport Appliance, Inc., et al.*
Sup. Ct. of CA - Cty. of Santa Clara (Case No. 23CV421926)
Final Approval Granted on February 19 2026 (Hon. Theodore C. Zayner)

d. *Jacob Villalobos v. Cornwall Security Services, Inc.*
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 22STCV28166)
Final Approval Granted on August 05 2024 (Hon. Stuart M. Rice)

e. *Rosemary Iglesias, et al. v. Laundry Planet, LLC, et al.*
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 23STCV28632)
Final Approval Granted on January 21 2026 (Hon. William F. Highberger)

f. *Anthony Sikes v. Wing Dhaba, Inc., et al.*

Sup. Ct. of CA - Cty. of Solano (Case No. FCS054490)
Final Approval Granted on December 14 2023 (Hon. Stephen Gizzi)

g. *Kenneth Gibson v. Ross Stores, Inc., d/b/a Ross Dress For Less*
Sup. Ct. of CA - Cty. of Alameda (Case No. 23CV048864)
Final Approval Granted on December 12 2025 (Hon. Patrick McKinney)

h. *Isaiah Ma v. Heritage Clinic and the Community Assistance Program for Seniors*
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 24STCV13396)
Final Approval Granted on December 04 2025 (Hon. Carolyn B. Kuhl)

i. *Mindi Hampton, et al. v. Infusion4Health, Inc.*
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 24STCV02692)
Final Approval Granted on December 04 2025 (Hon. Carolyn B. Kuhl)

j. *Michael Mejia Jr. v. Gus's Market Channel, LLC, et al*
Sup. Ct. of CA - Cty. of San Francisco (Case No. CGC-21-593231)
Final Approval Granted on November 18 2025 (Hon. Christine Van Aken)

k. *Tojyia Green v. Magnum Management Corporation, et al.*
Sup. Ct. of CA - Cty. of Orange (Case No. 30-2022-01276962-CU-OE-CXC)
Final Approval Granted December 01 2025 (Hon. William D. Claster)

l. *Michelle Townsend v. Maxim Healthcare Services, Inc.*
Sup. Ct. of CA - Cty. of Alameda (Case No. 22CV005450)
Final Approval Granted on December 04 2025 (Hon. Peter Borkon)

m. *Amanda Redmond v. Flatiron West, Inc. dba Flatiron Constructors Inc. and Flatiron Construction Corp.*
Sup. Ct. of CA - Cty. of San Diego (Case No. 37-2023-00008174-CU-OE-CTL)
Final Approval Granted on November 18 2025 (Hon. Judy S. Bae)

n. *Anton Louis Thompson v. Career Systems Development Corp, et al.*
Sup. Ct. of CA - Cty. of Sacramento (Case No. 24CV009265)
PAGA Approval Granted on October 28 2025 (Hon. Jill H. Talley)

5. United Employees Law Group has prosecuted this litigation solely on a contingent-fee basis and has been completely at risk that it would not receive any compensation for prosecuting claims against the Defendant.

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

7. I performed, among other things, the following tasks related to this matter: analyzed initial clients' claims; performed initial investigation inclusive of research necessary for case evaluation and searched court records relative to possible competing cases. I consulted with co-counsel as to issues relating to the prosecution of this case, participated in its mediation and settlement and reviewed all

settlement papers along with orders from the court, law and motion papers and assisted with client liaison and other tasks assigned by lead counsel.

8. The hourly rate for my time is $950.00 per hour, which is my usual and customary hourly rate charged for my services in similar complex class actions.

9. The total number of hours spent by me on this litigation is 18.10 hours through November 10, 2026. The hours billed are broken down as follows:

Intake and client signup: 6.50

Review documents and correspondence: 6.40

Review and edit MOU, settlement agreement and prelim approval: 3.00

Oversee admin and review and edit final approval: 2.20

Total Hours = 18.10

10. My involvement with the case was primarily in the very initial stages of vetting the potential client, along with verification that there were no conflicting cases existing at that time. During most of the litigation there was ongoing communications with co-counsel discussing strategy and status of litigation.

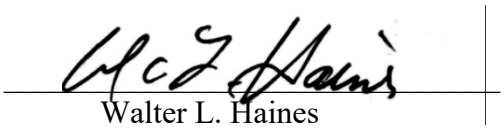
11. My total lodestar amount through November 10, 2026 is $17,195.00 (18.10 hours @ $950/hour).

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

13. I believe that the Settlement is fair, adequate, and reasonable. The Settlement provides substantial monetary benefits to Class Members and is a product of diligent efforts of Class Counsel to obtain the best possible result for the Class Members. This Settlement was reached following thorough legal and factual research and analysis, thorough review of extensive data relative to the claims in the action, arduous settlement negotiations, and thorough investigation of the underlying facts by the respective parties and review of records. The settlement negotiations were, at all times, adversarial and non-collusive in nature. The proposed Settlement is within the range of reasonableness, and Class Members have supported the Settlement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 10th day of November, 2026 in Los Angeles, California.



Walter L. Haines