

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Matthew K. Moen (SBN 305956)
mmoen@haineslawgroup.com
Susan J. Perez (SBN 329044)
sperez@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355
Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

ELIDA CORONA, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

WEST AMERICAN RUBBER
COMPANY, LLC, a California Limited
Liability Company; and DOES 1 through
100,

Defendants.

Case No.: 30-2024-01383622-CU-OE-CXC

*[Case assigned for all purposes to the Hon.
Melissa R. McCormick, Dept. CX105]*

**DECLARATION OF FLETCHER W.
SCHMIDT IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA ACTION
SETTLEMENT, ATTORNEYS' FEES AND
COSTS, AND CLASS REPRESENTATIVE
ENHANCEMENT PAYMENT**

Date: May 28, 2026
Time: 2:00 p.m.
Dept.: CX105

Action Filed: March 4, 2024
Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

1. I am a Partner at the Haines Law Group, APC, and counsel for the named plaintiff Corona (“Plaintiff”) in the above-captioned matter. I am a member in good standing 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.

3. During my time with Boren, Osher & Luftman LLP and Haines Law Group, APC, my practice has been solely devoted to litigating plaintiff-side wage and hour class actions in California state and federal court. I am currently responsible for managing a caseload of over seventy-five (75) active wage and hour class actions in which I am integrally involved in all aspects of the litigation.

- *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 a 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 Judge 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);
- *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-00775372-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge Glenda Sanders presiding (certifying five separate classes for claims for unpaid wages, unreimbursed expenses, failure to authorize and permit rest periods, and derivative claims);
- *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United States District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six classes of employees for rest period violations, wage statement violations, meal period violations, and overtime and double-time violations);
- *Staublein v. Wells Fargo Bank, National Association*, Case No. CIVDS1712267, San Bernardino Superior Court, Honorable David Cohn presiding (certifying a wage statement class);
- *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).

5. I have also been appointed as Class Counsel in well over 100 different class action settlements in California state and federal courts, and have recovered in excess of \$150 million dollars through settlements in which I personally have acted as the lead attorney for the plaintiff.

6. In 2025, I was awarded attorney's fees following a lodestar cross-check based on hourly rate of \$825 in the following cases:

- *Georgina Espinoza, et al. v. Warehouse Demo Services, Inc., et al.*, Case No. 17CV310844, Santa Clara County Superior Court, Honorable Theodore C. Zayner, presiding (using an hourly rate of \$750 for work performed in 2021-2025);
- *Juan David Arreola Carrillo v. KPS Global, LLC*, Case No. 22STCV19527, Los Angeles County Superior Court, Honorable Samantha Jessner, presiding (using an hourly rate of \$825 for work performed in 2022-2025);
- *In Re: Stanislaus Food Products Company Employment Cases*, Lead Case No. CV-23-001433, Stanislaus County Superior Court, Honorable John D. Freeland, presiding (using an hourly rate of \$825 for work performed in 2023-2025);
- *Joseph Jones v. Chandler Aggregates, Inc.*, Case No. CVRI2204692, Riverside County Superior Court, Honorable Harold W. Hopp, presiding (using an hourly rate of \$825 for work performed in 2022-2025);
- *Samantha Vvanti, et al. v. O'Reilly Auto Enterprises, LLC*, Case No. 19STCV00091, Los Angeles County Superior Court, Honorable Timothy Patrick Dillon, presiding (using an hourly rate of \$825 for work performed in 2022-2025);
- *Elia Paredes Acosta vs. Defendant SMG/Long Beach Convention and Entertainment Center*, Case No. 21STCV27103, Los Angeles County Superior Court, Honorable

Theresa M. Traber, presiding (using an hourly rate of \$825 for work performed in 2022-2025);

- *John Ledbetter, et al. v. CJ Logistics America, LLC*, Case No. CIVSB2207118, San Bernardino County Superior Court, Honorable David E. Driscoll, presiding (using an hourly rate of \$825 for work performed in 2022-2025); and
- *Ada Mendoza v. Desert Valley Date LLC*, Case No. CVRI2301048, Riverside County Superior Court, Honorable Harold W. Hopp, presiding (awarding attorney's fees following a lodestar cross-check based on an hourly rate of \$825 for work performed in 2023-2026).

7. So far in 2026, I have been awarded attorney's fees following a lodestar cross-check based on hourly rates of \$825 and \$875 per hour in the following cases:

- *Alfonso Almaraz v. World Oil Corp.*, Case No. 23STCV18296, Los Angeles County Superior Court, Honorable David S. Cunningham III, presiding (using an hourly rate of \$825 for work performed in 2023-2026);
- *Ada Mendoza v. Desert Valley Date, LLC, et al.*, Case No. CVRI2301048, Riverside County Superior Court, Honorable Harold W. Hopp, presiding (using an hourly rate of \$825 for work performed in 2023-2026);
- *Angel Sanchez v. Ickler Electric Corporation*, Case No. 37-2024-00017621-CU-OE-CTL, San Diego County Superior Court, Honorable Joel R. Wohlfeil, presiding (using an hourly rate of \$875 for work performed in 2024-2026); and
- *Brian Loza v. Hidden Valley Investments, Inc., et al.*, Case No. 24CU009062C, San Diego County Superior Court, Honorable Katherine A. Bacal, presiding (using an hourly rate of \$875 for work performed in 2024-2026).

8. In March 2023, I served as trial counsel for the plaintiff and the aggrieved employees in the matter of *Abraham Taduran v. James R. Glidewell, Dental Ceramics, Inc. dba Glidewell Laboratories*, Case No. 30-2017-00934037-CU-OE-CXC, Orange County Superior Court, Honorable William Claster presiding, which was a case brought under the Private

1 Attorneys General Act, Labor Code §§ 2698 *et seq.*, that resulted in a six-figure verdict in favor
2 of the aggrieved employees.

3 9. In each year from 2018 through 2025, Thomson Reuters and Los Angeles
4 Magazine recognized me as a Top Young Attorney in Southern California in the annual Rising
5 Star Edition of Super Lawyers. This is an honor awarded to no more than two-and-a-half percent
6 (2.5%) of attorneys under the age of forty in Southern California each year.

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

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

12 12. I am not aware of any other class, representative, or other collective actions in any
13 other court or jurisdiction that assert claims similar to those asserted in this action on behalf of a
14 class or group of individuals some or all of whom would also be members of the class defined in
15 this action.

16 I declare under penalty of perjury under the laws of California and the United States that
17 the foregoing is true and correct. Executed on May 5, 2026, at El Segundo, California.

18
19 
20 Fletcher W. Schmidt