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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF NAPA

VICTOR FIGUEROA, ALDEN PEREZ,
CYNTHIA IZQUIERDO, and KENNETH
ZIEG on behalf of themselves and all others
similarly situated,

Plaintiffs,

vs.

MULTI-COLOR CORPORATION, an Ohio
Corporation; WS PACKAGING GROUP,
INC.; and DOES 1-50, inclusive,

Defendants.

Case No. 24CV000347

*[Assigned to the Hon. Joseph J. Solga, Dept.
B]*

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

Date: October 20, 2026
Time: 8:30 a.m.
Dept.: B

Action Filed: March 7, 2024
Trial Date: None Set

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I, Paul K. Haines, declare as follows:

1. I am a shareholder and principal of the law firm Haines Law Group, APC, and co-counsel for the named Plaintiffs Victor Figueroa, Alden Perez, Cynthia Izquierdo, and Kenneth Zieg (“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 am a 2006 graduate of Pepperdine University School of Law, where I graduated *cum laude*. During law school, I worked as a law clerk for the appellate firm of Horvitz & Levy, located in Encino, California. I also spent a semester in law school working as an extern for the Honorable Edward Rafeedie, District Judge for the United States District Court for the Central District of California.

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

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

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

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

17 6. In July 2012, I transitioned into litigating wage and hour class actions from the
18 Plaintiff’s side, first as a Partner with the law firm of Boren, Osher & Luftman, LLP, and since
19 February 2016 as a Shareholder of Haines Law Group, APC. Currently, over ninety percent (90%)
20 of my practice is dedicated exclusively to the prosecution of wage and hour class actions, and my
21 law firm is currently responsible for prosecuting over seventy-five (75) wage and hour class
22 actions filed in both State and Federal courts throughout California.

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

- 25 • *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-
26 CXC, California Superior Court, County of Orange, Honorable Judge Gail A. Andler,
27 presiding (certifying a class of employees who were misclassified as independent
28 contractors);

- 1 • *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United
2 States District Court, Central District of California, Honorable Judge Beverly Reid
3 O’Connell, presiding (conditionally certifying an unpaid FLSA overtime wage class);
- 4 • *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States
5 District Court, Central District of California, Honorable Judge John F. Walter, presiding
6 (certifying a rest period violation class and conditionally certifying a FLSA unpaid
7 overtime wage class);
- 8 • *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court,
9 Northern District of California, Honorable Judge Haywood S. Gilliam, Jr., presiding
10 (conditionally certifying an unpaid FLSA overtime wage class);
- 11 • *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States
12 District Court, Eastern District of California, Honorable Jennifer L. Thurston, presiding
13 (conditionally certifying an unpaid FLSA overtime wage class);
- 14 • *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC,
15 California Superior Court, County of Orange, Honorable Judge William Claster, presiding
16 (certifying unpaid overtime wage class and waiting time penalty class);
- 17 • *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-775372-CU-OE-CXC,
18 California Superior Court, County of Orange, Honorable Glenda Sanders, presiding
19 (certifying piece rate pay plan classes, expense reimbursement class, wage statement class,
20 and waiting time penalties class);
- 21 • *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United
22 States District Court, Central District of California, Honorable Dolly M. Gee presiding
23 (certifying six classes of employees for rest period violations, wage statement violations,
24 meal period violations, and overtime and double-time violations);
- 25 • *Vasquez v. Kraft Heinz Foods Company*, Case No. 16-cv-2749-WQH-BLM, United States
26 District Court, Southern District of California, Honorable William Q. Hayes presiding
27 (certifying classes for automatic meal period deductions, manual time deductions, late
28 meal periods, and derivative wage statement and waiting time penalties);

- 1 • *Caudle, et al. v. Sprint/United Management Company, et al.* Case No. C 17-06874-WHA,
2 United States District Court, Northern District of California, Honorable William H. Alsup
3 presiding (certifying three classes of employees for unlawful wage deduction violations,
4 wage statement violations, and waiting time violations);
- 5 • *Francisco Perez v. Sunbelt Rentals, Inc.*, Case No. 37-2018-00026405-CU-OE-CTL, San
6 Diego County Superior Court, Honorable Eddie C. Sturgeon, presiding (certifying a wage
7 statement class);
- 8 • *Barbara J. Bowlin-Burdick v. Life Care Centers of America, Inc.*, Case No. BC657139,
9 Los Angeles County Superior Court, Honorable Maren E. Nelson, presiding (certifying
10 classes for late meal period violations, on-remises rest period violations, wage statement
11 violations, and waiting time violations);
- 12 • *Staublein v. Wells Fargo Bank, National Association*, Case No. CIVDS1712267, San
13 Bernardino County Superior Court, Honorable David Cohn, presiding (certifying a wage
14 statement class);
- 15 • *Quentin McDonald, et al. v. Sierra Pacific Industries*, Case No. 191133, Shasta County
16 Superior Court, Honorable Tamara L. Wood, presiding (certifying classes for rest period
17 violations, meal period violations, unpaid overtime and minimum wage violations,
18 expense reimbursement violations, wage statement violations, and waiting time penalties);
- 19 • *Danica N. Keich, et al. v. U.S. Healthworks, Inc., et al.*, Case No. 37-2017-00015343-CU-
20 OE-CTL, San Diego County Superior Court, Honorable Eddie C. Sturgeon, presiding
21 (certifying classes for rest period violations, meal period violations, on-call pay violations,
22 wage statement violations, and waiting time violations);
- 23 • *George Gomez v. The Bedrock Company*, Case No. CIVDS1824255, San Bernardino
24 County Superior Court, Honorable David Cohn, presiding (certifying claims for unpaid
25 overtime and minimum wage violations, meal period violations, rest period violations,
26 wage statement violations, and waiting time penalties);

- *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, unpaid rest period violations, wage statement violations, and waiting time penalties);
- *Ortencia Soto v. Puretek Corporation*, Case No. 21STCV28904, Los Angeles County Superior Court, Honorable Lawrence P. Riff, presiding (certifying claims for meal period violations, rest period violations, waiting time penalties, and wage statement violations); and
- *Quincy Calloway, et al. v. Lightstorm Entertainment, Inc., et al.*, Case No. 24STCV05939, Los Angeles County Superior Court, Honorable Theresa Traber, presiding (certifying claims for unpaid overtime wage violations, wage statement violations, and waiting time penalties).

8. I have been appointed as Class Counsel in hundreds of wage and hour class action settlements in state and federal courts within California, and my law firm has recovered in excess of \$500 million dollars on behalf of our clients.

9. In 2025, I was awarded attorney's fees following a lodestar cross-check based on a rate of \$925 per hour in the following cases:

- *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 \$925 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 \$925 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 \$925 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 \$925 for work performed in 2022-2025);

- *Elia Paredes Acosta v. SMG/Long Beach Convention and Entertainment Center, et al.*, Case No. 21STCV27103, Los Angeles County Superior Court, Honorable Theresa M. Traber, presiding (using an hourly rate of \$925 for work performed in 2021-2025); and
- *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 \$925 for work performed in 2022-2025).

10. So far in 2026, I have been awarded attorney's fees following a lodestar cross-check based on hourly rates of \$925 and \$975 per hour in the following cases:

- *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 \$925 for work performed in 2023-2026);
- *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 \$925 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 \$975 for work performed in 2024-2026);
- *Vicente Sandoval v. Cybex Security Solutions, LLC, et al.*, Case No. 30-2024-01398109-CU-OE-CXC, Orange County Superior Court, Honorable Layne H. Melzer, presiding (using an hourly rate of \$975 for work performed in 2024-2026);
- *Falcao Rivelino Hernandez, et al. v. LDI Mechanical, Inc.*, Case No. CVRI2401542, Riverside County Superior Court, Honorable Harold W. Hopp, presiding (using an hourly rate of \$975 for work performed in 2024-2026);
- *Jose Fuentes v. Southwest Material Handling, Inc.*, Case No. CVRI2404365, Riverside County Superior Court, Honorable Harold W. Hopp, presiding (using an hourly rate of \$975 for work performed in 2024-2026);

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- 1 • *Brianna McCulin, et al. v. South Coast Children’s Society, Inc.*, Case No. 25STCV09319,
2 Los Angeles County Superior Court, Honorable Elaine Lu, presiding (using an hourly rate
3 of \$975 for work performed in 2025-2026);
- 4 • *Jose Moran vs. Araca Merchandise, L.P., et al.*, Case No. 24STCV02003, Los Angeles
5 County Superior Court, Honorable William F. Highberger, presiding (using an hourly rate
6 of \$975 for work performed in 2024-2026);
- 7 • *Jose Vasquez v. Santa Clarita Valley Committee on Aging Corporation, dba SCV Senior*
8 *Center*, Case No. 25STCV06096, Los Angeles County Superior Court, Honorable Laura
9 A. Seigle, presiding (using an hourly rate of \$975 for work performed in 2025-2026);
- 10 • *Darren Cain v. Bellhops Moving, LLC*, Case No. 24STCV09965, Los Angeles County
11 Superior Court, Honorable Theresa M. Traber, presiding (using an hourly rate of \$975 for
12 work performed in 2024-2026); and
- 13 • *George Gomez v. The Bedrock Company*, Case No. CIVDS1824255, San Bernardino
14 County Superior Court, Honorable Kevin C. Lee, presiding (using an hourly rate of \$975
15 for work performed in 2018-2026).

16 11. In approximately 2018, I was selected to be a member of the Los Angeles Superior
17 Court, Complex Civil Department Ad Hoc Wage and Hour Committee, which was chaired by the
18 Honorable Judge Amy D. Hogue and Honorable Judge David S. Cunningham. The committee
19 was comprised of 8 plaintiff’s attorneys and 8 defense attorneys and was consulted for
20 recommendations regarding wage and hour class action cases, including preparing model class
21 action and PAGA action settlement agreements which are now publicly available at
22 <http://www.lacourt.org/forms/all>.

23 12. In April 2019, I served as trial counsel for the Plaintiff in the matter of *Calhoun v.*
24 *Aqua Tech Water Management Inc.*, Case No. BS169815, Los Angeles County Superior Court,
25 Honorable Theresa M. Traber presiding, which was an individual wage-and-hour case that
26 resulted in a six-figure verdict in favor of Plaintiff. I was subsequently awarded attorney’s fees at
27 my requested rate of \$650 per hour in 2020.

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2 13. In March 2023, my firm served as trial counsel for the plaintiff and aggrieved
3 employees in the matter of *Abraham Taduran v. James R. Glidewell, Dental Ceramics, Inc. dba*
4 *Glidewell Laboratories*, Case No. 30-2017-00934037-CU-OE-CXC, Orange County Superior
5 Court, Honorable William Claster presiding, which was a case brought under the Private
6 Attorneys General Act, Labor Code §§ 2698 *et seq.*, and resulted in a six-figure verdict in favor
7 of the aggrieved employees and a six-figure statutory attorney’s fee award in which I was
8 approved at my requested rate of \$850 per hour for work performed from 2017 to 2024.

9 14. In every year from 2015 through 2017, Thomson Reuters recognized me as a Top
10 Young Attorney in Southern California in the annual Rising Stars Edition of Super Lawyer. This
11 is an honor awarded to no more than two-and-a-half percent of attorneys under the age of forty in
12 Southern California each year. In every year from 2018 through 2026, Thomson Reuters
13 recognized me as a “Super Lawyer” in the annual Super Lawyer magazine, an honor awarded to
14 no more than five percent of all attorneys in Southern California each year.

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

18 16. I confirm that I do not have any interest or involvement in, and am not affiliated
19 with, the proposed settlement administrator, ILYM Group, Inc. I also confirm that I do not have
20 any interest or involvement in, and am not affiliated with, the proposed *cy pres* recipient, Legal
21 Aid at Work.

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23 I declare under penalty of perjury under the laws of California and the United
24 States that the foregoing is true and correct. Executed on September 23, 2026, at El Segundo,
25 California.

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27 Paul K. Haines
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