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7 Attorneys for Plaintiffs, and all others similarly situated

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF SAN DIEGO**

10 **(UNLIMITED JURISDICTION)**

11 JONATHAN GUTIERREZ, JOSE RIVERA,  
12 OSCAR RAMIREZ, and GUSTAVO  
13 GUTIERREZ, on behalf of themselves and all  
14 others similarly situated, and the general public,  
15 and as "Aggrieved Employees" on behalf of other  
16 "Aggrieved Employees" and the State of  
17 California under the Labor Code Private  
Attorneys General Act of 2004 under the Private  
Attorneys General Act of 2004,

18 *Plaintiff(s),*

19 vs.

20 S & L OIL, INC., a California corporation;  
21 GRANT ROAD GAS & AUTO CARE, LLC, a  
22 California limited liability company; GREAT  
23 AMERICA GAS & AUTO CARE, LLC, a  
24 limited liability company; VIPAN K. GUPTA, an  
individual; RAVI GUPTA, an individual; and  
DOES 1-50, inclusive,

25 *Defendant(s).*

Case No. 37-2024-00018132-CU-OE-CTL

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

Hearing Date: February 11, 2027

Hearing Time: 9:00 a.m.

Hearing Dept.: C-69, The Honorable  
Evan P. Kirvin

Action filed: April 17, 2024



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**DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, WALTER L. HAINES, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and am an attorney of record for plaintiffs Jonathan Gutierrez, Jose Rivera, Oscar Ramirez, and Gustavo Gutierrez (collectively "Plaintiffs") in their lawsuit against defendants S & L Oil, Inc., Vipin K. Gupta, and Ravi Gupta (collectively "Defendants"). I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement. 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 am a highly experienced class action counsel, 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 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.

3. I have no conflicts of interest with the class or with the Class Representatives. I am not related to the representative Plaintiffs. I have not previously represented Defendants in any matter. I do not represent opposing factions within the class in that all claims are predicated upon the same theories of liability and benefit all class members equally. In sum, I am well-suited to act as Class Counsel and will continue to vigorously represent the interests of the class.

4. I am not aware of any class, representative, or other collective action in any other court, in this, or any other jurisdiction, that asserts claims similar to those asserted in this action, on behalf of the class or group of individuals, some or all of whom would also be



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1 members of the class to find in this action. I have made a reasonable inquiry of the other  
2 members of my law firm to determine whether they are aware of any such similar actions.  
3 Based on these inquiries, I am aware of no such similar actions.

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

6 Executed on June 3, 2026 at Los Angeles, California.

7  
8   
9 WALTER L. HAINES,  
10 Declarant



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