

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Andrew J. Rowbotham (SBN 301367)
arowbotham@haineslawgroup.com
Ian T. Mallery (SBN 359132)
imallery@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 LOS ANGELES

ERIC LOVENG, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

ORANGE CORROSION SERVICES, INC., a
California corporation; and DOES 1 through
100, inclusive.

Defendants.

Case No.: 24STCV13607

*[Assigned for all purposes to the Hon. David S.
Cunningham III, Dept. 11]*

**DECLARATION OF IAN T. MALLERY IN
SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: June 17, 2026
Time: 9:00 a.m.
Dept.: 11

Action Filed: May 30, 2024
Trial Date: None Set

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I, IAN T. MALLERY, declare as follows:

1. I am an associate with Haines Law Group, APC, and counsel for the named Plaintiff Eric Loveng (“Plaintiff”) 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 received a Bachelor of Arts degree from Washington University in St. Louis in 2021, and a Juris Doctor from the University of Minnesota Law School in 2024. I was admitted to the California State Bar in December 2024.

3. During law school, I served as Student Director of the University of Minnesota Clemency Project Clinic and was selected as a Human Rights Fellow with the University of Minnesota Human Rights Center.

4. Prior to and during law school I interned and clerked for the American Civil Liberties Union of Missouri, where I worked on individual civil rights litigation cases, including drafting complaints, memoranda, and briefs on substantive litigation issues. I also participated in a year-long internship with the National Labor Relations Board – Region 18, where I investigated unfair labor practices charges, negotiated settlements, drafted memoranda, and issued complaints on behalf of the General Counsel. Since September 2024, I have worked at Haines Law Group, APC, first as a law clerk then as an associate attorney once I was admitted to the California State Bar in December 2024.

5. Although non-exhaustive, the types of tasks I have performed include: conducting client intakes, drafting complaints, appearing at hearings in state and federal courts, corresponding with opposing counsel, drafting and responding to written discovery, drafting and opposing a variety of motions including motions for summary judgment, drafting mediation briefs, attending mandatory settlement conferences, drafting long-form settlement agreements, and drafting motions for preliminary and final settlement approval.

1 6. The following is a non-exhaustive list of the class action settlements in which I
2 played a major role assisting Class Counsel, and which have been granted final approval: *Raul*
3 *Camacho v. Residential Fire Systems, Inc.* Case No. 30-2015-775372-CU-OE-CXC, Orange
4 County Superior Court; *Ruben Hernandez v. Neovia Logistics Services, LLC*, Case No.
5 CIVSB2305867, San Bernardino County Superior Court; *Juan David Arreola Carillo v. KPS*
6 *Global, LLC*, Case No. 22STCV19527, Los Angeles County Superior Court; *Eric Prado v.*
7 *Wilwood Engineering*, Case No. 2023CUOE015773, Ventura County Superior Court; *Alfonso*
8 *Almaraz v. World Oil Corp.*, Case No. 23STCV18296, Los Angeles County Superior Court; *Angel*
9 *Sanchez v. Ickler Electric Corporation*, Case No. 37-2024-00017621-CU-OE-CTL, San Diego
10 County Superior Court.

11 7. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation.
12 The details of the work completed by Plaintiff's Counsel in this case are set forth in the declaration
13 of Andrew J. Rowbotham, filed concurrently herewith.

14 8. I confirm that I do not have any interest or involvement in, and am not affiliated
15 with, the proposed settlement administrator, Apex Class Action LLC.

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

20 I declare under penalty of perjury under the laws of the United States and the state of
21 California that the foregoing is true and correct. Executed on May 26, 2026, at El Segundo,
22 California.

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25 Ian T. Mallery
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