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Additional Counsel on Next Page

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MONTEREY

DONNA BRADLEY, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

APARTMENT MANAGEMENT
CONSULTANTS, L.L.C., a limited
liability company; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 24CV002090

**DECLARATION OF WALTER HAINES IN
SUPPORT OF PLAINTIFFS’ MOTION FOR
PRELIMINARY APPROVAL OF CLASS AND
PAGA ACTION SETTLEMENT,
CONDITIONAL CERTIFICATION,
APPROVAL OF CLASS NOTICE, SETTING
OF FINAL APPROVAL HEARING DATE**

Date: October 16, 2026

Time: 8:30 a.m.

Judge: Hon. Ian A. Rivamonte

Dept.: 14

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1 **DECLARATION OF WALTER L. HAINES IN SUPPORT OF PLAINTIFF'S MOTION**
2 **FOR APPROVAL OF PAGA SETTLEMENT AND RELEASE**

3 I, Walter L. Haines, declare:

4 1. I am an attorney licensed to practice before all courts of the State of California and am
5 an attorney of record for Plaintiff Marylourdes Hormigas ("Plaintiff") in this action. I am a
6 member in good standing of the State Bar of California.

7 2. I make this Declaration in support of Plaintiff's Motion for Preliminary Approval of
8 PAGA Settlement and Release. I make this Declaration based on my personal knowledge and if
9 called to testify I could and would competently testify to the matters contained in this
10 Declaration.

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

20 4. United Employees Law Group, PC has prosecuted this litigation solely on a
21 contingent-fee basis, and has been completely at risk that it would not receive any compensation
22 for prosecuting claims against the defendants.

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

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

Executed this 4th day of September 2026, at Los Angeles, California.


Walter L. Haines