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Attorneys for Plaintiff TERRANCE OLIVER, on behalf of himself and other aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

TERRANCE OLIVER, an individual; on behalf of himself and other aggrieved employees Plaintiff, v. OFF DUTY OFFICERS INC., a California corporation; and DOES 1 through 100, inclusive, Defendant.	CASE NO. 24CU013040C [Assigned for all purposes to the Hon. Blaine K. Bowman – Dept. C-74] **DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION TO APPROVE PAGA SETTLEMENT** Date: March 5, 2027 Time: 8:30 a.m. Dept.: C-74 Reservation No.: 106094

DECLARATION OF WALTER L. HAINES

I, Walter L. Haines, declare and state as follows:

1. I am counsel of record for Plaintiff Terrance Oliver (hereafter referred to as "Plaintiff" or "Oliver") in this action against Defendant Off Duty Officers, Inc. ("Defendant"). I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiff's Motion for Approval of PAGA Settlement and Release. 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 highly experienced in class and representative action litigation with over 40 years of practice that includes extensive involvement in matters of this nature. I am the most senior attorney in 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 Plaintiff or with the PAGA Members. I am not related to any representative Plaintiff. I have not previously represented Defendant in any matter. I do not represent opposing factions within the PAGA Members in that all claims are predicated upon the same theories of liability and benefit all PAGA Members equally. In sum, I am well-suited to act as Plaintiff's counsel and will continue to vigorously represent the interests of the PAGA Members.

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

5. United Employees Law Group has participated in this litigation and has performed work on behalf of Plaintiff since the inception of this litigation. The hours submitted

with this declaration are solely for work performed on behalf of the PAGA Members alleged in the above-entitled California action and not any other state or federal matter.

6. I performed, among other things, the following tasks related to this matter: analyzed initial clients' claims; performed initial investigation inclusive of research necessary for case evaluation and searched court records relative to possible competing cases. I consulted with co-counsel as to issues relating to the prosecution of this case, reviewed all settlement papers, law and motion papers, along with orders from the court, and assisted with client liaison and other tasks assigned by lead counsel.

7. The hourly rate for my time is $950 per hour, which is my usual and customary hourly rate charged for my services in similar complex class and representative actions.

8. The total number of hours spent by me on this litigation is 12.90 hours through October 27, 2026.

9. My total lodestar amount through October 27, 2026, is $12,255.00.

10. In addition to the legal services rendered by me, during the prosecution and resolution of this action attorneys at United Employees Law Group expended time preparing for, participating in, and completing work following mediation. In addition to my own time, attorney Peggy J. Reali expended 10.55 hours performing mediation preparation (.30 hours), attending and participating in mediation (9.00 hours), and performing post-mediation work (.25 hours) and assisting to prepare the PAGA approval motion (1.00 hours). Ms. Reali's hourly rate as an attorney practicing for over 35 years largely and successfully in the area of class action / PAGA matters, is $950. Accordingly, Ms. Reali's lodestar is $10,022.50. Ms. Reali's CV will be produced upon request.

11. I am familiar with UELG's timekeeping practices and have reviewed the billing records reflecting Ms. Reali's work on this matter. These records were prepared at or near the time the services were performed and maintained in the ordinary course of United Employees Law Group's business. Based on my review, the 10.55 hours recorded for Ms. Reali accurately reflect the legal services she performed in connection with the mediation and settlement of this action. These hours were reasonably and necessarily incurred in furtherance of the litigation and

its resolution

12. Accordingly, United Employees Law Group's total lodestar is $22,277.50 (my lodestar of $12,255.00 + Ms. Reali's of $10,022.50).

13. No charges have been included for paralegal or staff time spent on this matter.

14. I believe that the Settlement is fair, adequate, and reasonable. The Settlement provides substantial monetary benefits to PAGA Members and is a product of the diligent efforts of Plaintiff's Counsel to obtain the best possible result for the PAGA Members. This Settlement was reached following thorough legal and factual research and analysis, thorough review of extensive data relative to the claims in the action, arduous settlement negotiations, and thorough investigation of the underlying facts by the respective parties and review of records. The settlement negotiations were, at all times, adversarial and non-collusive in nature. The proposed Settlement is within the range of reasonableness, and PAGA Members have supported the Settlement.

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

Executed this 27th day of October 2026 at Los Angeles, California.



Walter L. Haines,
Declarant