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Attorneys for Plaintiff EUGENE DELA PENA and all others similarly situated

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

EUGENE DELA PENA, an individual; on behalf of himself and all others similarly situated and the general public,

Plaintiffs,

v.

RENAL ADVANTAGE, INC., a Delaware corporation; and DOES 1 to 100, inclusive,

Defendants.

Case No. 3:24-cv-8649-JD

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

Date: June 11, 2026
Time: 11:00 a.m.
Location: Courtroom 11, 19th Floor

Removal Filed: December 2, 2024
Trial Date: January 25, 2027
Judge: Hon. James Donato

DECLARATION OF WALTER L. HAINES

I, Walter L. Haines, declare:

1. I am an attorney licensed to practice before all courts of the State of California, and admitted to practice before the Northern District of California. I am a member in good standing with the State Bar of California.

2. I am an owner of United Employees Law Group, PC, and am co-counsel for the Plaintiff herein. I have personal knowledge of the facts herein. If called as a witness, I could and would competently testify to those facts under oath. I submit this declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement.

3. I am a highly experienced class and representative action attorney, 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. I have served as class counsel in numerous wage-and-hour class and representative actions in both federal and state courts in California.

Sampling of Class Action/PAGA Wage & Hour Cases as Appointed Class Counsel

4. *Abdolla Kowighadoush v. NKSFB, LLC*
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 23STCV23689)
Final Approval Granted on January 14 2026 (Hon. Timothy Patrick Dillon)

Juan Fernandez v. Elite Lighting, dba Elite Lighting Corp.
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 23STCV12044)
Final Approval Granted on August 05 2025 (Hon. Laura A. Seigle)

Andrew Trejo Baca; Christopher Franceschi v. Airport Appliance, Inc., et al
Sup. Ct. of CA - Cty. of Santa Clara (Case No. 23CV421926)
Final Approval Granted on February 19 2026 (Hon. Theodore *C. Zayner)*

Jacob Villalobos v. Cornwall Security Services, Inc.

Sup. Ct. of CA - Cty. of Los Angeles (Case No. 22STCV28166)
Final Approval Granted on August 05 2024 (Hon. Stuart M. Rice)

Rosemary Iglesias, et al. v. Laundry Planet, LLC, et al.
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 23STCV28632)
Final Approval Granted on January 21 2026 (Hon. William F. Highberger)

Anthony Sikes v. Wing Dhaba, Inc., et al.
Sup. Ct. of CA - Cty. of Solano (Case No. FCS054490)
Final Approval Granted on December 14 2023 (Hon. Stephen Gizzi)

Hizhen Zhao, et al. v. Haidilao Restaurant California, Inc.
State of CA - Civil Rights Department (CRD No. 202502-28309327)
FE SA on November 11 2025

Kenneth Gibson v. Ross Stores, Inc., d/b/a Ross Dress For Less
Sup. Ct. of CA - Cty. of Alameda (Case No. 23CV048864)
Final Approval Granted on December 12 2025 (Hon. Patrick McKinney)

Isaiah Ma v. Heritage Clinic and the Community Assistance Program for Seniors
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 24STCV13396)
Final Approval Granted on December 04 2025 (Hon. Carolyn B. Kuhl)

Mindi Hampton, et al. v. Infusion4Health, Inc.
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 24STCV02692)
Final Approval Granted on December 04 2025 (Hon. Carolyn B. Kuhl)

Michael Mejia Jr. v. Gus's Market Channel, LLC, et al
Sup. Ct. of CA - Cty. of San Francisco (Case No. CGC-21-593231)
Final Approval Granted on November 18 2025 (Hon. Christine Van Aken)

Tojyia Green v. Magnum Management Corporation, et al.
Sup. Ct. of CA - Cty. of Orange (Case No. 30-2022-01276962-CU-OE-CXC)
Final Approval Granted December 01 2025 (Hon. William D. Claster)

Michelle Townsend v. Maxim Healthcare Services, Inc.
Sup. Ct. of CA - Cty. of Alameda (Case No. 22CV005450)
Final Approval Granted on December 04 2025 (Hon. Peter Borkon)

Amanda Redmond v. Flatiron West, Inc. dba Flatiron Constructors Inc. and Flatiron Construction Corp.
Sup. Ct. of CA - Cty. of San Diego (Case No. 37-2023-00008174-CU-OE-CTL)
Final Approval Granted on November 18 2025 (Hon. Judy S. Bae)

Anton Louis Thompson v. Career Systems Development Corp, et al.
Sup. Ct. of CA - Cty. of Sacramento (Case No. 24CV009265)
PAGA Approval Granted on October 28 2025 (Hon. Jill H. Talley)

Teri Flores v. Serendib Holdings Group, LLC, et al.
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 20STCV00289)
Final Approval Granted on August 27 2024 (Hon. Elihu M. Berle)

Anthony Coe v. Pacific Choice Seafood Company, et al.
Sup. Ct. of CA - Cty. of Sacramento (Case No. 34-2020-00274708)
Final Approval Granted on October 03 2025 (Hon. Lauri A. Damrell)

Sisilia Lealao v. U.S. Aviation Services Corp
Sup. Ct. of CA - Cty. of Los Angeles (Case No. 24STCV03049)
Final Approval Granted on October 07 2025 (Hon. Samantha P. Jessner)

Shelia Cromwell, Aaron Salazar, and Andrew Forrest v. Desert Cremation Society, Inc., et al
Sup. Ct. of CA - Cty. of San Bernardino (Case No. CIVSB2116331)
Final Approval Granted on July 09 2024 (Hon. Joseph T. Ortiz)

Angela Smith v. Agreeya Solutions, Inc.
Sup. Ct. of CA - Cty. of San Joaquin (Case No. STK-CV-UOE-2023-002783)
Final Approval Granted on October 01 2025 (Hon. Esmeralda Zendejas)

Jeffrey Pipich, et al. (Eve Storm) v. O'Reilly Auto Enterprises, LLC
U.S. District Court - Southern District of Ca. (Case No. 3:21-cv-01120-AHG)
Final Approval Granted on January 07 2025 (Hon. Allison H. Goddard)

5. United Employees Law Group has prosecuted this litigation solely on a contingent-fee basis and has been completely at risk that it would not receive any compensation for prosecuting claims against the Defendants. United Employees Law Group has participated in this litigation and has performed work on behalf of Plaintiff since the inception of this litigation.

6. I have 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 participated in

its mediation and settlement and reviewed settlement papers along with orders from the court, law and motion papers and assisted with client liaison and other tasks assigned by lead counsel.

7. I believe that the Settlement is fair, adequate, and reasonable. The Settlement provides substantial monetary benefits to class members and is a product of diligent efforts of Class Counsel to obtain the best possible result for the class 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 class members have supported the Settlement

8. I have no conflicts of interest with the class or with the Class Representative. I am not related to the representative plaintiff. 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.

9. 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 that the foregoing is true and correct. Executed on May 4, 2026, at Los Angeles, California.

WALTER L. HAINES