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7 Attorneys for Plaintiff(s),
8 RAYMOND REED, and all others similarly situated
9 (Additional attorneys for parties on following page)

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF SAN DIEGO**
12 **(UNLIMITED JURISDICTION)**

13 RAYMOND REED, on behalf of himself and all
14 others similarly situated, and the general public,
and as an “aggrieved employee” on behalf of
15 himself and other similarly situated “aggrieved
employees” under the Labor Code Private
16 Attorneys General Act of 2004,

17 *Plaintiff(s),*

18 vs.

19 TRAVELER'S CONVENIENCE, INC., a
20 California corporation; and DOES 1–50,
21 inclusive,

22 *Defendant(s).*

Case No. 24CU011598C

**DECLARATION OF WALTER L.
HAINES IN SUPPORT OF PLAINTIFF
RAYMOND REED'S MOTION FOR
APPROVAL OF PAGA SETTLEMENT**

Hearing Date: July 10, 2026
Hearing Time: 10:15 a.m.
Hearing Dept.: C-66, The Honorable
Wendy M. Behan

Action filed: September 17, 2024



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1 **DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION FOR**
2 **APPROVAL OF PAGA SETTLEMENT**

3 I, WALTER L. HAINES, declare as follows:

4 1. I am an attorney duly licensed to practice law in the State of California and am
5 an attorney of record for Plaintiff Raymond Reed (“Plaintiff”) in his lawsuit against Defendant
6 Traveler's Convenience, Inc. (“Defendant”). I am a member in good standing of the State Bar
7 of California. I make this Declaration in support of Plaintiff’s Motion for Approval of PAGA
8 Settlement. I make this Declaration based on my personal knowledge and if called to testify I
9 could and would competently testify to the matters contained in this Declaration.

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

19 3. I have no conflicts of interest with the Aggrieved Employees or with the Plaintiff.
20 I am not related to the representative plaintiff. I have not previously represented Defendant in
21 any matter. I do not represent opposing factions within the Aggrieved Employees in that all
22 claims are predicated upon the same theories of liability and benefit all Aggrieved Employees
23 equally. In sum, I am well-suited to act as PAGA Counsel and will continue to vigorously
24 represent the interests of the Aggrieved Employees.

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

28 5. United Employees Law Group has participated in this litigation and has



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1 performed work on behalf of Plaintiff Raymond Reed since the inception of this litigation. The
2 hours submitted with this declaration are solely for work performed on behalf of the Aggrieved
3 Employees alleged in the above-entitled California action and not any other state or federal
4 matter.

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

11 7. The hourly rate for my time is \$725.00 per hour which is my usual and customary
12 hourly rate charged for my services in similar complex class and representative actions.

13 8. The total number of hours spent by me on this litigation is 25.10 hours through
14 September 30, 2025.

15 9. My total lodestar amount through September 30, 2025, is \$18,197.50.

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

17 11. My out of pocket expenses for postage are \$1.22. Total out of pocket expenses
18 are \$1.22.

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

28 I declare under the penalty of perjury of the laws of the State of California that the



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1 foregoing is true and correct to the best of my knowledge.

2 Executed on September 30, 2025, at West Hollywood, California.

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5 WALTER L. HAINES,
6 Declarant
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