

HAINES LAW GROUP, APC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF RIVERSIDE

JOSE FUENTES, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SOUTHWEST MATERIAL HANDLING,
INC., a California corporation; and DOES 1
through 100, inclusive,

Defendants.

Case No. CVRI2404365

*[Case assigned for all purposes to the Hon.
Harold W. Hopp, Dept. 1]*

**DECLARATION OF FLETCHER W.
SCHMIDT IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA ACTION
SETTLEMENT**

Date: January 23, 2026
Time: 8:30 a.m.
Dept.: 1

Action Filed: August 1, 2024
Trial Date: None Set

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1. I am a Partner at the Haines Law Group, APC, and counsel for the named Plaintiff
 2. (Plaintiff) in the above-captioned matter. I am a member in good standing of the
 3. State of California and am admitted to practice in this Court. I have personal knowledge
 4. of the facts stated in this declaration and could testify competently to them if called upon to do
 5. so.

3. During my time with Boren, Osher & Luftman LLP and Haines Law Group, APC, my practice has been solely devoted to litigating plaintiff-side wage and hour class actions in California state and federal court. I am currently responsible for managing a caseload of over seventy-five (75) active wage and hour class actions in which I am integrally involved in all aspects of the litigation.

- *Medeiros v. Vortex Financial Management Inc.*, Case No. 30-2013-00644741-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge Gail A. Andler presiding (certifying a class of employees who were misclassified as independent contractors);
- *Javine v. San Luis Ambulance Service, Inc.*, Case No. CV13-07480 BRO (SSx), United States District Court, Central District of California, Honorable Judge Beverly Reid O’Connell presiding (conditionally certifying an unpaid FLSA overtime wage class);
- *Prado v. Warehouse Demo Services, Inc.*, Case No. CV14-3170 JFW (Ex), United States District Court, Central District of California, Honorable Judge John F. Walter presiding

(certifying a rest period violation class and conditionally certifying a FLSA unpaid overtime wage class);

- *Bower v. Cycle Gear, Inc.*, Case No. CV14-2712 HSG, United States District Court, Northern District of California, Honorable Judge Haywood S. Gilliam, Jr. presiding (conditionally certifying an unpaid FLSA overtime wage class);
- *Vega v. Weatherford U.S., Limited Partnership*, Case No. CV14-1790-JLT, United States District Court, Eastern District of California, Honorable Judge Jennifer L. Thurston presiding (conditionally certifying an unpaid FLSA overtime wage class);
- *Galvan v. AMVAC Chemical Corporation*, Case No. 30-2014-00716103-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge William Claster presiding (certifying unpaid overtime wage class and waiting time penalty class);
- *Camacho v. Residential Fire Systems, Inc.*, Case No. 30-2015-00775372-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge Glenda Sanders presiding (certifying five separate classes for claims for unpaid wages, unreimbursed expenses, failure to authorize and permit rest periods, and derivative claims);
- *Ontiveros v. Safelite Fulfillment, Inc., et al*, Case No. CV 15-7118-DMG (RAOx), United States District Court, Central District of California, Honorable Dolly M. Gee presiding (certifying six classes of employees for rest period violations, wage statement violations, meal period violations, and overtime and double-time violations);
- *Staublein v. Wells Fargo Bank, National Association*, Case No. CIVDS1712267, San Bernardino Superior Court, Honorable David Cohn presiding (certifying a wage statement class);
- *Danica N. Keich, et al. v. U.S. Healthworks, Inc., et al.*, Case No. 37-2017-00015343-CU-OE-CTL, San Diego County Superior Court, Honorable Eddie C. Sturgeon, presiding (certifying classes for rest period violations, meal period violations, on-call pay violations, wage statement violations, and waiting time violations);
- *George Gomez v. The Bedrock Company*, Case No. CIVDS1824255, San Bernardino County Superior Court, Honorable David Cohn, presiding (certifying claims for unpaid

overtime and minimum wage violations, meal period violations, rest period violations, wage statement violations, and waiting time penalties); and

- *Aurora Gatica v. Valley Ag, Inc. et al.*, Case No. 19CECG03018, Fresno County Superior Court, Honorable Tyler D. Tharpe, presiding (certifying claims for meal period violations, rest period violations, wage statement violations, and waiting time penalties).

5. I have also been appointed as Class Counsel in well over 100 different class action settlements in California state and federal courts, and have recovered in excess of \$150 million dollars through settlements in which I personally have acted as the lead attorney for the plaintiff.

6. In 2024 I was awarded attorney's fees following a lodestar cross-check based on a rate of \$750 per hour in the following cases:

- *Arcos v. Panoramic Doors, LLC*, Case No. 37-2021-00048823-CU-OE-CTL, San Diego County Superior Court, Honorable Loren G. Freestone, presiding (using an hourly rate of \$750 for work performed in 2021-2023);
- *Ramirez v. Wyndham Vacation Ownership, Inc.*, Case No. 20CV01715, Santa Barbara County Superior Court, Honorable James F. Rigali, presiding (using an hourly rate of \$750 for work performed from 2020-2024);
- *Aaron Hallum, et al. v. FCA US, LLC*, Case No. CIVDS1936782, San Bernardino County Superior Court, Honorable Joseph T. Ortiz, presiding (using an hourly rate of \$750 for work performed in 2021-2024);
- *Rafael Perez v. Kyocera SGS Precision Tools, Inc.*, Case No. 30-2022-01299232-CU-OE-CXC, Orange County Superior Court, Honorable Randall J. Sherman, presiding (using an hourly rate of \$750 for work performed in 2022-2024);
- *Kevin Murphy, et al. v. Fusion Learning, Inc.*, Case No. 2:21-cv-06732-JAK (ASx), United States District Court, Central District of California, Honorable John A. Kronstadt, presiding (approving and finding reasonable an hourly rate of \$750 for work performed in 2022-2024);

- *Target Wage and Hour Cases*, Case No. JCCP 5259, Lead Case No. CIVSB2209126, San Bernardino County Superior Court, Honorable Wilfred J. Schneider, Jr., presiding (using an hourly rate of \$750 for work performed in 2022-2024); and
- *Karen Trudelle, et al. v. Children of the Rainbow, Inc.*, Lead Case No. 37-2022-00034860-CU-OE-CTL, San Diego County Superior Court, Honorable Robert Longstreth, presiding (using an hourly rate of \$750 for work performed in 2022-2024).

7. In 2025, I have been awarded attorney's fees following a lodestar cross-check based on hourly rates of \$750 and \$825 in the following cases:

- *Ruben Hernandez, et al. v. Neovia Logistics Services, LLC, et al.*, Case No. CIVSB2305867, San Bernardino County Superior Court, Honorable Tony Raphael, presiding (using an hourly rate of \$750 for work performed in 2023-2025);
- *Jonathan Jauregui Gutierrez, et al. v. PASHA Automotive Services*, Case No. 37-2021-00011967-CU-CO-CTL, San Diego County Superior Court, Honorable Katherine A. Bacal, presiding (using an hourly rate of \$750 for work performed in 2021-2025);
- *Miriam Moreno v. Beacon Day School, Inc.*, Case No. 30-2022-01296662-CU-OE-CXC, Orange County Superior Court, Honorable Lon F. Hurwitz, presiding (using an hourly rate of \$750 for work performed in 2022-2025);
- *Raul Camacho, et al. v. Residential Fire Systems, Inc., et al.*, Case No. 30-2015-00775372-CU-OE-CXC, Orange County Superior Court, Honorable Lon F. Hurwitz, presiding (using an hourly rate of \$750 for work performed in 2015-2025);
- *Chrisian Alanis v. Leonard Roofing, Inc.*, Case No. BC672028, Los Angeles County Superior Court, Honorable William F. Highberger, presiding (using an hourly rate of \$750 for work performed in 2017-2025);
- *Georgina Espinoza, et al. v. Warehouse Demo Services, Inc., et al.*, Case No. 17CV310844, Santa Clara County Superior Court, Honorable Theodore C. Zayner, presiding (using an hourly rate of \$750 for work performed in 2021-2025);

- 1 • *Juan David Arreola Carrillo v. KPS Global, LLC*, Case No. 22STCV19527, Los Angeles
2 County Superior Court, Honorable Samantha Jessner, presiding (using an hourly rate of
3 \$825 for work performed in 2022-2025);
- 4 • *In Re: Stanislaus Food Products Company Employment Cases*, Lead Case No. CV-23-
5 001433, Stanislaus County Superior Court, Honorable John D. Freeland, presiding (using
6 an hourly rate of \$825 for work performed in 2023-2025);
- 7 • *Joseph Jones v. Chandler Aggregates, Inc.*, Case No. CVRI2204692, Riverside County
8 Superior Court, Honorable Harold W. Hopp, presiding (using an hourly rate of \$825 for
9 work performed in 2022-2025);
- 10 • *Samantha Vvanti, et al. v. O'Reilly Auto Enterprises, LLC*, Case No. 19STCV00091, Los
11 Angeles County Superior Court, Honorable Timothy Patrick Dillon, presiding (using an
12 hourly rate of \$825 for work performed in 2022-2025);
- 13 • *Elia Paredes Acosta v. SMG/Long Beach Convention and Entertainment Center, et al.*,
14 Case No. 21STCV27103, Los Angeles County Superior Court, Honorable Theresa M.
15 Traber, presiding (using an hourly rate of \$825 for work performed in 2021-2025); and
- 16 • *John Ledbetter, et al. v. CJ Logistics America, LLC*, Case No. CIVSB2207118, San
17 Bernardino County Superior Court, Honorable David E. Driscoll, presiding (using an
18 hourly rate of \$825 for work performed in 2022-2025).

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20 8. In March 2023, I served as trial counsel for the plaintiff and the aggrieved
21 employees in the matter of *Abraham Taduran v. James R. Glidewell, Dental Ceramics, Inc. dba*
22 *Glidewell Laboratories*, Case No. 30-2017-00934037-CU-OE-CXC, Orange County Superior
23 Court, Honorable William Claster presiding, which was a case brought under the Private
24 Attorneys General Act, Labor Code §§ 2698 *et seq.*, that resulted in a six-figure verdict in favor
25 of the aggrieved employees and a six-figure statutory attorney's fee award in which I was
26 approved at my requested rate of \$750 per hour for work performed from 2017 to 2024.

27 9. In each year from 2018 through 2025, Thomson Reuters and Los Angeles
28 Magazine recognized me as a Top Young Attorney in Southern California in the annual Rising

1 Star Edition of Super Lawyers. This is an honor awarded to no more than two-and-a-half percent
2 (2.5%) of attorneys under the age of forty in Southern California each year.

3 10. As counsel for Plaintiff, I have been closely involved in all aspects of this litigation
4 since its inception. The details of the work completed by Plaintiff's Counsel in this case are set
5 forth in the declaration of Matthew K. Moen, filed concurrently herewith.

6 11. I confirm that I do not have any interest or involvement in, and am not affiliated
7 with, the proposed settlement administrator, Phoenix Settlement Administrators.

8 12. After conducting a reasonable inquiry, I am not aware of any class, representative
9 or other collective action pending in any court that asserts claims similar to those in this action
10 that could be extinguished or adversely affected by this Settlement. Further, Matthew Moen, an
11 attorney at my firm and proposed class counsel in this matter, also sent a firm-wide email
12 inquiring if any member of my law firm was aware of any class, representative, or other collective
13 action pending in this or any other court that asserts claims similar to those asserted in this action.
14 I know this because I was copied on Mr. Moen's firm-wide email. No one from my law firm
15 stated that they were aware of any class, representative, or other collection action pending in any
16 other court that asserts claims similar to those asserted in this action.

17 I declare under penalty of perjury under the laws of California and the United States that
18 the foregoing is true and correct. Executed on December 30, 2025, at El Segundo, California.

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