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(Additional attorneys for parties on following page)

10 **UNITED STATES DISTRICT COURT**
11 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

12 JEFFREY PIPICH, EVE STORM, GARY
13 CULL, MELISSA KOLAKOWSKI, and
14 DANIEL LOPEZ, on behalf of themselves
and all others similarly situated, and as
15 “aggrieved employees” on behalf of other
“aggrieved employees” under the Labor
16 Code Private Attorneys General Act of
2004,

18 *Plaintiffs,*

19
20 vs.

21 O'REILLY AUTO ENTERPRISES, LLC,
22 a Delaware limited liability company;
Express Services, Inc., a Colorado
23 corporation dba Express Employment
24 Professionals; and DOES 2–50, inclusive,

25 *Defendants.*

Case No. 3:21-cv-01120-AHG

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

Action filed: July 16, 2021
Hearing Court: 2125, The
Honorable Allison
H. Goddard



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1 **DECLARATION OF WALTER L. HAINES IN SUPPORT OF MOTION**
2 **FOR PRELIMINARY APPROVAL OF CLASS ACTION 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
5 and am an attorney of record for Plaintiffs Jeffrey Pipich, Eve Storm, Gary Cull,
6 Melissa Kolakowski, and Daniel Lopez (collectively “Plaintiffs”) in their lawsuit
7 against Defendants O'Reilly Auto Enterprises, LLC (“O'Reilly”) and Express
8 Services, Inc. (“Express”) (collectively “Defendants”). I am a member in good
9 standing of the State Bar of California. I make this Declaration in support of
10 Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement. I make this
11 Declaration based on my personal knowledge and if called to testify I could and
12 would competently testify to the matters contained in this Declaration.

13 2. I am a highly experienced class action counsel specializing in actions
14 of this nature. I have been practicing law for over 40 years and I am highly
15 experienced in actions of this nature. I am the most senior attorney at my firm,
16 United Employees Law Group, and worked on the litigation of this matter. I formed
17 United Employees Law Group in 2005, primarily to represent employees in their
18 wage claims. I have represented over 1,500 clients in wage and hour disputes of
19 which more than 300 cases were class actions with settlements totaling over
20 \$400,000,000. These class action cases include Fortune 500 companies such as
21 Pepsi, Intel, Home Depot, Kaiser, Wells Fargo, Bank of America, Cisco Systems,
22 First American Title Co., Yahoo!, WellPoint, Inc., Sun Microsystems, and Kaiser
23 Foundation Hospitals.

24 3. I have no conflicts of interest with the class or with the Class
25 Representatives. I am not related to the representative Plaintiffs. I have not
26 previously represented Defendants in any matter. I do not represent opposing
27 factions within the class in that all claims are predicated upon the same theories of
28 liability and benefit all class members equally. In sum, I am well-suited to act as



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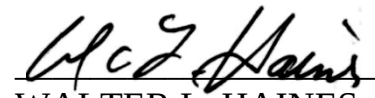
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1 Class Counsel and will continue to vigorously represent the interests of the class.

2 4. I have negotiated many wage and hour class settlements, including
3 many involving the same issues presented here. I believe that the Settlement is a
4 fair and reasonable settlement in light of the complexities of the case and
5 uncertainties of class certification and litigation, and a fair result for the Class
6 Members.

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

9 Executed on May 23rd, 2024 at Los Angeles, California.

10 
11 WALTER L. HAINES,
12 Declarant
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