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8 Attorneys for Plaintiff,  
9 KAREEM WILSON, and all others similarly situated (additional attorney listed  
10 on next page)

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**  
13 **WESTERN DIVISION**

14  
15 KAREEM WILSON, on behalf of  
16 himself, and all others similarly  
17 situated, and as an “aggrieved  
18 employee” on behalf of other  
19 “aggrieved employees” under the  
Labor Code Private Attorneys  
General Act of 2004

20 Plaintiff(s),

21 v.

22  
23 J.B. HUNT LOGISTICS, INC.,  
an Arkansas corporation;  
24 J.B. HUNT TRANSPORT, INC.,  
25 a business entity of unknown form;  
26 and DOES 1 through 50, inclusive

27 Defendant(s).  
28

Case No. 2:18-cv-3487-SVW-AFMx

**DECLARATION OF WALTER  
HAINES IN SUPPORT OF  
PLAINTIFF’S UNOPPOSED  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Action filed: March 2, 2018  
Hearing Date: April 5, 2021  
Hearing Time: 1:30 p.m.  
Hearing Court: 10A, Hon. Stephen V.  
Wilson



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**ADDITIONAL ATTORNEY FOR PLAINTIFF**

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**DECLARATION OF WALTER HAINES**

I, WALTER HAINES, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and the U.S. District Court for the Central District of California and am an attorney of record for Kareem Wilson (“Plaintiff”) in this Action against defendants J.B. Hunt Logistics, Inc and J.B. Hunt Transport, Inc. (collectively “Defendants”).

2. I am a member in good standing of the State Bar of California. I make this Declaration in support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement. 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.

3. I am a highly experienced in class and representative action litigation. I have been practicing law for over 40 years and I am highly experienced in actions 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. 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.

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

5. 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, participated in its mediation and settlement and reviewed



1 all settlement papers along with orders from the court, law and motion papers and  
2 assisted with client liaison and other tasks assigned by lead counsel.

3 6. I believe that the Settlement achieved in this action is fair, adequate,  
4 and reasonable. The Settlement provides substantial monetary benefits to the Class  
5 Members and is a product of diligent efforts of Plaintiff’s Counsel to obtain the best  
6 possible result for the Class Members. The Settlement was reached following  
7 thorough legal and factual research and analysis, thorough review of extensive data  
8 relative to the claims in the action, arduous settlement negotiations, and thorough  
9 investigation of the underlying facts by the respective parties and review of records.  
10 The settlement negotiations were, at all times, adversarial and non-collusive in  
11 nature.

12 7. The hourly rate for my time is \$675 per hour which is my usual and  
13 customary hourly rate charged for my services in similar complex class actions.

14 8. The total number of hours spent by me on this litigation is 21.40 hours  
15 through January 26, 2021. The hours billed are broken down as follows:

16 Intake and client signup: 6.50

17 Co-counsel discussions: 3.70

18 Review documents: 5.20

19 Review and edit MOU, settlement agreement and prelim approval: 5.40

20 Total Hours = 20.80

21 9. My involvement with the case was primarily in the very initial stages  
22 of vetting the potential client, along with verification that there were no conflicting  
23 cases existing at that time. During most of the litigation there were ongoing  
24 communications with co-counsel discussing strategy and status of litigation. In  
25 order to provide the court a reasonable estimate of the time involved, all email  
26 communications were reviewed, which is the source of these estimates.

27 10. My total lodestar amount through January 26, 2021 is \$14,040.00.

28 11. No charges have been included for paralegal or staff time spent on this



1 matter.

2 12. 10. My out of pocket expenses for court fees are \$32.55. These fees  
3 are paid to various courts to obtain records in order to determine if there is a similar  
4 case already on file in any court. This is done to help us avoid top filing on a case  
5 already filed. My out of pocket expenses for postage is \$11.43. Total out of pocket  
6 expenses are \$43.98.

7 13. I believe that the Settlement is fair, adequate, and reasonable. The  
8 Settlement provides substantial monetary benefits to the Class Members and is a  
9 product of diligent efforts of Plaintiff’s counsel to obtain the best possible result for  
10 the Class Members. The Settlement was reached following thorough legal and  
11 factual research and analysis, thorough review of extensive data relative to the  
12 claims in the action, arduous settlement negotiations, and thorough investigation of  
13 the underlying facts by the respective parties and review of records. The settlement  
14 negotiations were, at all times, adversarial and non-collusive in nature.

15 14. I have no conflicts of interest with the class or with the Plaintiff. I am  
16 not related to the representative Plaintiff. I have not previously represented  
17 Defendants in any matter. I do not represent opposing factions within the class in  
18 that all claims are predicated upon the same theories of liability and benefit all class  
19 members equally. In sum, I am well-suited to act as Class Counsel and will continue  
20 to vigorously represent the interests of the class.

21 I declare under the penalty of perjury of the laws of the United States of  
22 America that the foregoing is true and correct to the best of my knowledge.

23 Executed on Tuesday, January 26, 2021 at Los Angeles, California.

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27 WALTER HAINES,  
28 Declarant

