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Attorneys for PLAINTIFFS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

ANNKLEIN PACIA, an individual, on behalf
of herself, and on behalf of all persons
similarly situated,

Plaintiff,

v.

KILROY REALTY, L.P., a Limited
Partnership; KILROY REALTY
CORPORATION, a Corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 21STCV20624

**DECLARATION OF PLAINTIFF
ANNKLEIN PACIA IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Hearing Date: March 29, 2023
Hearing Time: 10:30 a.m.

Judge: Hon. Stuart M. Rice
Department: 1

1 I, ANNKLEIN PACIA, declare as follows:

2 1. I am over eighteen years of age and if called as a witness, I could and would competently
3 testify to the following facts from my own personal knowledge. I am a named Plaintiff in the above
4 wage and hour class action filed against KILROY REALTY, L.P. and KILROY REALTY
5 CORPORATION (hereinafter "Defendants").

6 2. This declaration is being submitted in support of Plaintiffs' Motion for Preliminary
7 Approval of Class Action and PAGA Settlement.

8 3. I believe that I am, have been and will continue to represent the interests of the class
9 fairly and adequately. I have claims that are typical of the claims the Class Members that I am seeking
10 to represent.

11 4. Generally, my lawsuit claims that Defendants failed to pay for all hours worked, failed to
12 provide lawful meal and rest periods, failed to provide accurate itemized wage statements, failed to
13 provide wages when due, failure to reimburse employees for required expenses, and violation of FCRA,
14 ICRAA, and CCRAA. I performed work for Defendants between March of 2020 to October of 2020.

15 5. I believe that my claims are typical of the claims of the Class Members that I am seeking
16 to represent because I worked for Defendants and was subject to the same practices affecting all other
17 Class Members concerning unpaid minimum and overtime wages, missed meal and rest periods,
18 unreimbursed business expenses, and received similar wage statements. Therefore, legally and
19 factually, I share the same claims as all other Class Members and can represent those workers
20 adequately. My claims and the Class Members' claims arise from the same course of conduct by
21 Defendant, involve the same policies, are based on the same legal theories, and are subject to the same
22 defenses.

23 6. I do not have any conflicts of interests with other Class Members, and have prosecuted
24 the case vigorously on behalf of the Class. My interests are entirely coextensive with the interests of
25 the Class. I allege that I was injured by the same company-wide policies and practices to which the
26 proposed Class was subjected and seek the same relief. I have already demonstrated my ability to
27

1 advocate for the interests of the Class by initiating this litigation, undertaking extensive class discovery,
2 and evaluating the proposed settlement to assure that it is fair.

3 7. I am aware of my duties as the representative of the Class and have actively participated
4 in the prosecution of this case to date. I have communicated with counsel, provided documents to
5 counsel and participated in the investigation and negotiations in the Action. My interests are aligned
6 with those of the Class. Like the rest of the Class Members, I seek monetary relief under the same set
7 of facts and legal theories.

8 8. I understood at the time that I filed this action, that as a Class Representative, I owed a
9 duty to the putative class members to faithfully prosecute this action with their best interests at the
10 forefront of every decision. I understood that I could not make any decision in this action for the sole
11 benefit of my personal interest. I understood that in executing this duty, I might have been asked to
12 sacrifice my personal best interests for the benefit of the interests of the putative class members.
13 Nevertheless, I knowingly and voluntarily undertook this duty in order to provide the broadest possible
14 relief for the Class for what I perceived to be Defendant's unlawful wage and hour practices. I believe
15 that I faithfully executed the duties of a Class Representative throughout this litigation and will continue
16 to do until this litigation is fully and finally resolved.

17 9. I believe that the proposed settlement before the Court is fair, reasonable and adequate,
18 and made in the best interest of the Class Members. Consequently, I respectfully, and humbly, I ask
19 the Court to grant preliminary approval of the Settlement and all of its terms.

20 I declare under the penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct. Executed Mar 1, 2023, at Los Angeles, California

22 *Annklein Pacia*
23 By: Annklein Pacia (Mar 1, 2023 17:43 CST)
24 ANNKLEIN PACIA