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all others aggrieved

Additional Counsel Listed on Next Page

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

LUIS CRUZ, individually, and on behalf of all
others similarly situated; JAMES
CARAMAZZA, individually, and on behalf of
all others similarly situated; MICHAEL LEON,
individually, and on behalf of all others similarly
situated

Plaintiffs,

v.

GREYSTAR MANAGEMENT SERVICES, LP,
a Delaware limited partnership; GREYSTAR
REAL ESTATE PARTNERS, LLC, a Delaware
limited liability company; SUNRISE
RIVERSIDE, LLC, a Delaware limited liability
company, BRADLEY JOHNSON, an individual;
and DOES 1 through 100, inclusive,

Defendants.

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

06/22/2022 at 05:12:00 PM

Clerk of the Superior Court
By Regina Chanez, Deputy Clerk

Case No.: 37-2020-00009672-CU-OE-CTL

*[Assigned to the Hon. Carolyn Caiette in Dept.
C-70]*

**DECLARATION OF MICHAEL LEON IN
SUPPORT OF APPROVAL OF PAGA
SETTLEMENT**

HEARING INFORMATION:

Date: July 15, 2022

Time: 10:30 a.m.

Location: C-70

ds
ML

1 I, Michael Leon, declare:

2 1. I am over the age of 18 and am one of the named Plaintiffs in this matter. I have
3 personal knowledge of the matters stated herein and if called and sworn as a witness, I would and
4 could competently testify under oath thereto.

5 2. This declaration is submitted in support of Plaintiffs' Motion for Approval of
6 Representative Action Settlement.

7 3. I worked for Defendants from approximately March 2018 through approximately
8 November 6, 2019 as an hourly non-exempt maintenance and service technician.

9 4. From the time of the filing of the lawsuit, I have understood that this is a
10 representative action lawsuit where I represent the interests of all current and former non-exempt,
11 hourly-paid employees employed by Greystar Management during the period between February
12 21, 2019 through December 31, 2021.

13 5. I believe while working for Defendants, I and all current and former non-exempt,
14 hourly-paid employees employed by Greystar Management during the period between February
15 21, 2019 through December 31, 2021, were subject to the same policies and procedures regarding
16 when wages were paid, payment for the hours that we worked, including the overtime hours that
17 we worked, meal breaks, rest breaks, wage statements, and final payment of wages. I believe that
18 the claims of all current and former non-exempt, hourly-paid employees employed by Greystar
19 Management during the period between February 21, 2019 through December 31, 2021, were
20 identical to mine since Defendants' policies and procedures applied to the same to all of us.

21 6. I understand that I must continue to consider and protect the interests of all current
22 and former non-exempt, hourly-paid employees employed by Greystar Management during the
23 period between February 21, 2019 through December 31, 2021. I have been protecting the rights
24 of myself and all current and former non-exempt, hourly-paid employees employed by Greystar
25 Management during the period between February 21, 2019 through December 31, 2021, since
26 approximately February of 2020 when I started looking for an attorney before this lawsuit was
27 filed. I have been and continue to place the interest of all current and former non-exempt, hourly-
28 paid employees employed by Greystar Management during the period between February 21, 2019

1 through December 31, 2021 before my own.

2 7. I provided information and been available to my attorneys since approximately
3 February of 2020 when I was searching for my attorney. I have helped and been willing to support
4 the lawsuit in any way I can for the last 28 months since February of 2020 when I began searching
5 for an attorney for the claims in this lawsuit. I have searched for an attorney, met with my
6 attorneys to see if they would represent me, met with my attorneys to discuss the company's
7 policies, procedures, and practices for clocking in and out, paying wages for the hours that we
8 worked, overtime hours that we worked, meal breaks, rest breaks, reimbursement, wage
9 statements, and final payment of wages. I spent time searching for policies and procedures that
10 were given to me during my employment and any timecards and pay stubs, W2s, and other
11 documents related to my employment. I produced those documents to my attorneys. I tried my best
12 to respond to all my attorneys' telephone calls and interviews and I met with them in person and/or
13 telephonically to discuss any questions they had about my employment, Defendants' policies and
14 procedures, Defendants' termination of employees, or the documents I had provided to them. I
15 made myself available for the full day mediation in this case. Once the settlement agreement was
16 finalized, I spoke with my attorneys on multiple occasions to review and discuss the settlement
17 agreement before signing.

18 8. I also understand that in the event this matter proceeds to trial, I must come to court
19 to participate in the trial. I will come to court if I am needed and have been ready to perform any
20 responsibility that is necessary for this lawsuit. I know that I took a risk by filing this lawsuit
21 because if I lost, I would have to pay for all the costs in the lawsuit. I also have the risk of losing
22 income for any time that I would have to spend fulfilling my responsibilities including having to
23 attend the trial. I also believe I have taken a risk by filing this lawsuit because my employers in the
24 future may find out that I sued my employer, and they may not like it. The other employees will be
25 receiving money from this lawsuit and they have not had to file a lawsuit, look for an attorney, or
26 take the risks that I have had to take.

27 9. To date, I estimate I have spent more than 20 hours on this case.

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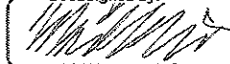
DECLARATION OF MICHAEL LEON IN SUPPORT OF APPROVAL OF PAGA SETTLEMENT

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1 10. I understand that any resolution or settlement of this matter must be approved by
2 the Court and must protect the interests of all current and former non-exempt, hourly-paid
3 employees employed by Greystar Management during the period between February 21, 2019
4 through December 31, 2021.

5 11. I am aware of the attorney fee sharing agreement in this matter of 70% to Bibiyan
6 Law Group, P.C., 25% to Wilshire Law Firm, and 5% to Lavi and Ebrahimiian, LLP. I approve the
7 amounts and allocations of this fee sharing agreement.

8 I declare under penalty of perjury, under the laws of State of California, that the foregoing is
9 true and correct. Executed this 8th day of June 2022, at Santa Ana, California.

DocuSigned by:

D1597E382389465

Michael Leon