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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

CHANDRIKA LORTSCHER, on behalf of the
State of California, as a private attorney general,

Plaintiff,

v.

D.R. HORTON, INC., a Corporation; D.R.
HORTON LOS ANGELES HOLDING
COMPANY, INC., a Corporation; D.R.
HORTON BAY, INC., a Corporation; D.R.
HORTON LA NORTH, INC., a Corporation;
D.R. HORTON, INC. – MIDWEST, a
Corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. **24VECV00165**

**DECLARATION OF CHANDRIKA
LORTSCHER IN SUPPORT OF
MOTION TO APPROVE PAGA
SETTLEMENT**

Hearing Date: September 30, 2025

Hearing Time: 9:00 a.M.

Judge: Hon. Eric Harmon Dept.: 107

Action Filed: February 3, 2022

Trial Date: Not Set

Reservation Number: 813548512346

1 I, Chandrika Lortscher, declare:

2 1. I am a competent adult, I have personal knowledge of the facts in this declaration,
3 and I am making this declaration on behalf of myself, as a named plaintiff, and in support of the
4 Motion to Approve Private Attorneys General Act Settlement.

5 2. I worked in California as a non-exempt employee of Defendants D.R. Horton, Inc.,
6 D.R. Horton Los Angeles Holding Company, Inc., D.R. Horton Bay, Inc., D. R. Horton LA North,
7 Inc., and D.R. Horton, Inc. - Midwest (collectively, "D. R. Horton") from May of 2015 to May of
8 2021.

9 3. I retained my attorneys who are experienced in PAGA representative action
10 litigation and claims against employers for violations of the California Labor Code. I have no
11 personal relationship or family ties to my attorneys or any officer of the Court. I am not aware of
12 having any actual or potential conflicts of interest with another PAGA Member in this case nor am
13 I aware of having any actual or potential conflicts of interest with the settlement administrator in
14 this matter.

15 4. I was subject to D. R. Horton's policies and practices that have been alleged as
16 unlawful in the Complaint and the PAGA notice sent to the Labor and Workforce Development
17 Agency. For example, I was regularly forced to work off the clock, as I was forced to wait to log
18 into the computer used to clock in for my shift, and then wait further to log into the clock in
19 applications. I did not always receive compliant meal and rest breaks, which were often late, short,
20 interrupted, or missed entirely – and when these violations occurred, I did not receive all break
21 penalty payments I was entitled to. In fact, I never received a single meal or rest period premium
22 from Defendant throughout my employment. Additionally, Defendant failed to properly list my
23 correct rate for overtime payments.

24 5. In bringing this case for myself, the State of California, and the other employees, I
25 understood a lot of work would be required and I was willing to, and did, do the work to keep the
26 case moving forward. For instance, before the complaint was filed I spoke to my attorneys several
27 times and discussed how Defendant implemented its company policies and procedures. I also
28 assisted my attorneys in their investigation into my claims by providing them documents and

1 answering their questions. I reviewed the complaint before it was filed and after it was filed, I was
2 given access to an electronic file sharing program that alerted me via email when important
3 documents were filed so that I could review them and keep up with the developments in the case. I
4 was informed that the Defendant had the right to take my deposition, and that the preparation and
5 deposition itself could take multiple days. Although my deposition was not taken, I feel I would
6 have been adequately prepared and comfortable to give testimony on my experiences.

7 6. My attorneys explained to me the risks and benefits of bringing a representative
8 action. I understood that I took on the risk, both professionally and financially, in pursuing the case
9 as a representative PAGA action.

10 7. A mediation took place on April 25, 2025 with Hon. Brian C. Walsh (Ret.), a well-
11 respected and experienced mediator. The mediation resulted in an agreement to settle the action. I
12 communicated with my attorneys regarding the terms of the settlement which was reached between
13 the parties and understood that the recovery in this case was for the benefit of my fellow coworkers,
14 not just for me, and therefore wanted the best possible result to be obtained for the PAGA Members.
15 I reviewed and signed the Memorandum of Understanding on May 19, 2025.

16 8. I have been actively involved with this lawsuit. Although I did not keep time
17 records, I was in regular contact with my attorneys, reviewed court filings, and spent a significant
18 amount of time on the issues presented during the lawsuit and in the settlement process. I estimate
19 that I spent approximately 20-30 hours working on this case up until this point.

20 9. I reviewed the final PAGA Settlement Agreement, and I believe it is fair and
21 reasonable given the facts of the case.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing
23 is true and correct.

24 Executed on 07/07/2025, at Northridge, CA.
25 (date) (city, state)

26 Chandrika Lortscher
27 Chandrika Lortscher (Jul 7, 2025 20:21 PDT)
28 Chandrika Lortscher