

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Matthew K. Moen (SBN 305956)
mmoen@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355
Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

NART KHATIB, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

HMH ASSOCIATES, INC., a California
Corporation; RDM MANAGEMENT, INC.,
a California Corporation; B2RE
CORPORATION, a California Corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No. 25STCV12178

*[Assigned for all purposes to the Hon. David S.
Cunningham III, Dept. 11]*

**DECLARATION OF PLAINTIFF
NART KHATIB IN SUPPORT OF
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT**

Date: June 30, 2026
Time: 9:00 a.m.
Dept.: 11

Action Filed: April 24, 2025
Trial Date: None Set

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

I, Nart Khatib, declare as follows:

1. I am an individual over the age of 18 and the named plaintiff in this matter. This declaration is submitted in support of approval of the proposed class and PAGA action settlement reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I was employed by HMH Associates, Inc., RDM Management, Inc., and B2RE Corporation (“Defendants”) as a non-exempt Resident Manager from approximately 2003 to approximately December 10, 2024. My primary job duties for Defendants included handling all open houses for available units, coordinating any and all maintenance needs of the residents, and other daily property management duties.

3. Throughout my employment, Defendants required that I record only four hours of work per day, six days per week, regardless of the actual number of hours I worked. In reality, my hours varied beyond four hours nearly every day, and I was regularly required to work over ten hours in a day and up to seven days a week. Further, despite requiring me to record 24 hours of work per week, Defendants only paid me for 21 hours of work each workweek. For a portion of my employment, Defendants also did not pay me for all of my vested vacation time if I had not used it before the end of the calendar year. Moreover, Defendants did not provide me with *any* meal periods during my employment, even though I frequently worked shifts over five and ten hours, and did not authorize and permit me to take *any* rest periods during my employment, even though I frequently worked shifts over 3.5 hours in length. Defendants also required that I carry and be responsive to my cellular phone at all times while on duty. However, for at least a portion of the time I worked for Defendants, I was not reimbursed for any of my monthly cell phone bill, despite Defendants requiring that I use my personal cell phone for necessary work purposes, including to communicate with my supervisors and Defendants' clients.

4. When I first filed my lawsuit, I understood that it had the chance to benefit Defendants' other workers by helping them recover the money and penalties they were owed. I felt that Defendants were not following the law, and I wanted Defendants to comply with the law

1 and treat their employees fairly. I feel I have taken on a greater burden than any of the other class
2 members since I have been actively involved in the litigation since the outset, and because it is
3 my name that is attached to the lawsuit. Although I was aware of the risks associated with filing
4 a public lawsuit, I chose to move forward with the case anyway. Through my efforts, Defendants
5 have agreed to a settlement that will benefit current and former employees of Defendants, and I
6 believe that I should be compensated for carrying the burden of this litigation for the benefit of
7 the other employees.

8 5. I have been an active participant in this case ever since I first sought out legal
9 representation over one year ago. Among other things, I searched for and provided numerous, key
10 documents for use in the lawsuit, including evidence of Defendants' timekeeping and payment
11 practices that formed the basis of my lawsuit, I provided factual information to my attorneys, had
12 many phone calls with my attorneys to discuss the claims in the lawsuit and Defendants' policies
13 and practices, litigation strategy, and updates on how the case was proceeding and how I could
14 further help the case, assisted my attorneys to help them prepare for mediation and draft a
15 mediation brief, made myself available during the full day mediation to answer any questions
16 posed by the mediator, discussed the status of the case and the settlement agreement with my
17 attorneys, and otherwise assisted my attorneys in moving this case towards resolution. I estimate
18 that I have spent approximately 25 to 30 hours in total on these activities.

19 6. I have no actual or potential conflicts of interest with any of the Settlement Class
20 members or the proposed settlement administrator, Apex Class Action Administration.

21
22 I declare under penalty of perjury under the laws of the state of California and the United
23 States that the foregoing is true and correct. Executed on Apr 21, 2021, at Signal Hill, California.

24
25 *Nart Khatib*

26 Nart Khatib