

DIVERSITY LAW GROUP, P.C.
 Larry W. Lee (State Bar No. 228175)
lwlee@diversitylaw.com
 Kristen M. Agnew (State Bar No. 247656)
kagnew@diversitylaw.com
 Nicholas Rosenthal (State Bar No. 268297)
nrosenthal@diversitylaw.com
 515 South Figueroa Street, Suite 1250
 Los Angeles, California 90071
 Telephone: (213) 488-6555
 Facsimile (213) 488-6554

POLARIS LAW GROUP
 William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com
 501 San Benito Street, Suite 200
 Hollister, California 95023
 Telephone: (831) 531-4214
 Facsimile (831) 634-0333

Attorneys for Plaintiff and the Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

ALEXIS TRISTAN, as an individual and on
 behalf of all others similarly situated,

Plaintiff,

vs.

AMERICAN HOMES 4 RENT, L.P., a Delaware
 limited partnership; and DOES 1 through 50,
 inclusive,

Defendants

Case No. 23STCV17006

DECLARATION OF ALEXIS TRISTAN IN SUPPORT OF PLAINTIFF'S TO APPROVE SETTLEMENT AGREEMENT PURSUANT TO THE PRIVATE ATTORNEYS GENERAL ACT

Date: March 11, 2024

Time: 10:00 a.m.

Dept.: 61

Reservation ID: 570905490120

Complaint Filed: July 20, 2023

Trial Date: None

DECLARATION OF ALEXIS TRISTAN

I, Alexis Tristan, declare as follows:

1. I am an individual over the age of 18. I am the named Plaintiff in the above-referenced action. I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I worked for Defendant American Homes 4 Rent, L.P (“Defendant”) as a non-exempt employee from about February 17, 2015 to May 16, 2023.

3. During my employment with Defendant, I worked overtime and received overtime wages. However, the overtime appeared to be paid at a rate that was below 1.5 times my regular rate of pay.

4. On my wage statement, overtime is shown on two or more lines—“overtime hours” and “overtime premium.” The rate that was displayed as the “overtime premium” is not the accurate rate used to calculate the “overtime premium” wages. Relatedly, when the “overtime premium” rate and/or “overtime hours” rate is multiplied by the corresponding number of hours worked at each rate, it does not correlate to the amount of overtime wages displayed on the wage statement. Also, when overtime was paid, the hours displayed on the wage statement do not equal the actual total hours worked during the pay period.

5. I understand that the claims alleged in this action were brought on a representative basis on behalf of other aggrieved employees who worked for Defendant. I do not believe I have any interests that are adverse to the other employees that are part of the PAGA settlement.

6. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of Defendant’s practices. To date, I have performed a number of tasks in my role as the representative, including, discussing this case and the facts involved with my attorneys, searching for and providing documents pertaining to the case to my attorneys, reviewing the files and pleadings, including my paystubs, the PAGA letter, the complaints, and the settlement agreement, and responding to any questions from my attorneys on a regular basis.

7. I have reviewed the Joint Stipulation of Settlement and Release (“Agreement” or “Settlement”) and I believe that the settlement is in the best interest of all aggrieved employees who worked for Defendant.

10 10. I am proud of the result and accomplishment of this lawsuit. I feel that it is a positive
11 accomplishment of this lawsuit and understand that other people will benefit because of the actions that
12 I have taken. I feel that I took upon myself the risk of this lawsuit and achieved a result for my other
former co-workers who did not have to file suit.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing is
15 true and correct. Executed on February 13, 2024, at Palmdale, California.

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