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Attorney for Plaintiff,
LAURA CECILIA ZARATE RAMIREZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

LAURA CECILIA ZARATE RAMIREZ, an individual,

Plaintiff,

v.

AMERICAN ASSETS TRUST, INC., a foreign corporation, and DOES 1 through 10, inclusive,

Defendants.

Case No.: 24CL031156C
Assigned for all purposes to the Hon. Michael T. Smyth, Dept. C-67

DECLARATION OF LAURA CECILIA ZARATE RAMIREZ IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR APPROVAL OF PAGA SETTLEMENT AND ENTRY OF JUDGMENT

IMAGED FILE

Hearing:
Date: May 14, 2027
Time: 9:00 a.m.
Dept.: C-67

[*Filed concurrently with Notice of Motion; Memorandum of Points and Authorities; Declaration of Hugo Ivan Salazar; and [Proposed] Order and Judgment*]

Complaint Filed: December 30, 2024
FAC Filed: August 28, 2026
Trial Date: [None set]

I, Laura Cecilia Zarate Ramirez, declare as follows:

1. I am an adult over the age of eighteen (18) and the named Plaintiff in the above captioned lawsuit. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would competently testify to them. My primary language is Spanish. This declaration was translated to me in Spanish before I signed it, and I understand its

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contents. I make this declaration in support of Plaintiff's Motion for Approval of PAGA Settlement.

2. I worked for American Assets Trust, Inc. beginning on March 16, 2020 as a Resident Service Coordinator. On March 1, 2023 I became a Maintenance Technician I. My employment ended on December 7, 2023.

3. During my employment, I often worked through my rest breaks in order to complete my assigned tasks, and I was not always able to take full, uninterrupted meal breaks.

4. I brought this case on my own behalf and, under the Private Attorneys General Act, on behalf of the State of California and other employees. I understand that in doing so I have a duty to act in the interests of the State and the other employees, and not only in my own interest. Despite having the opportunity to file and pursue my individual claims alone, I decided to serve as the named plaintiff and PAGA representative, to vindicate the rights of other and recover compensation on a representative basis.

5. I have participated in this case by meeting with my attorney to stay informed of ongoing developments in the case and to discuss the proposed settlement ultimately negotiated; providing information about my job duties, schedules, and breaks, and overall work experience; gathering documents and other material related to my work experience; and by reviewing filing and key documents including drafts of the complaint and the settlement agreement. These tasks required my time away from my personal time, work and family. I estimate that I have spent approximately 15-20 hours on this case. My understanding is that future tasks may require several more hours of my time

6. I understand the terms of the PAGA settlement, which were explained to me in Spanish. In my opinion, I believe the settlement is fair and reasonable, and I approved it.

7. My individual claims against American Assets Trust were resolved through a separate agreement with a release of all claims, including a Civil Code section 1542 waiver. I understand the financial terms of that agreement are confidential. No one promised me anything in connection with the PAGA settlement other than what is stated in the PAGA Settlement Agreement.

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8. I am requesting a service award of $2,500.00 for my time and effort in this case, and the named plaintiff and PAGA representative. In my opinion, this is fair and adequate. I understand the Court decides whether to approve that payment and in what amount, and I understand that in exchange I am providing a general release of my claims against American Assets Trust.

9. I do not have any relationship with the Settlement Administrator, Apex Class Action, and I am not aware of any conflict between my interests and those of the other employees.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 21 , 2026, at Ramona, California.

Firmado por:
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Laura Cecilia Zarate Ramirez

DECLARATION OF TRANSLATOR

I, Gustavo Garcia, declare that I am competent to translate from English into Spanish, and that on October 20, 2026, I translated the foregoing Declaration of Laura Cecilia Zarate Ramirez from English into Spanish for the declarant, who indicated that she understood its contents before signing it.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 20, 2026, at Chula Vista, California.

Gustavo Garcia