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Attorneys for Plaintiff Leah Pauli, individually,  
and on behalf of all others similarly situated.

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

ERNESTO AGUIRRE, an individual and  
on behalf of all others similarly situated;

Plaintiff,

vs.

AFTON PROPERTIES, INC., a California  
corporation; STAFFPAY, LLC, a  
California limited liability company; and  
DOES 1 through 50,

Defendants.

Case No. No. CIVSB2412177

*Assigned for all purposes to  
Hon. Wilfred J Schneider, Jr.,  
Dept. S32*

**DECLARATION OF LEAH PAULI IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
APPROVAL OF PAGA SETTLEMENT**

(Filed Concurrently with Notice of Motion and  
Motion for Approval of PAGA Settlement;  
Supporting Declarations and [Proposed]  
Judgment and Order)

DATE: April 21, 2026

TIME: 8:30 a.m.

DEPT: S32

Action Filed: December 17, 2023

Trial Date: Not Set

1 I, Leah Pauli, declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called upon to testify, I  
3 could and would do so competently under oath.

4 2. I make this declaration in support of my Motion for Approval of Private Attorneys  
5 General Act Representative Action Settlement.

6 3. I worked for Afton Properties, Inc. ("Defendant") as a non-exempt employee from  
7 May 2023 until February 2024 in the position of Community Manager.

8 4. Through my attorneys, I filed this action on April 8, 2024, on behalf of myself and all  
9 other non-exempt employees of Defendants.

10 5. With respect to the work I performed on the case, I participated in many conversations  
11 with my attorneys, gathered and reviewed documents, and provided information related to my  
12 working conditions and Defendants' company structure and operations. Throughout the course of this  
13 case, I contacted my attorneys regularly for updates on the status of the case.

14 6. For mediation, I assisted my attorneys in preparation and strategy. I spoke with my  
15 attorneys about the status of the case, its strengths and weaknesses and believed that I assisted them  
16 in evaluating the claims and the potential damages for use at that mediation.

17 7. After mediation, I reviewed the settlement agreement and discussed the terms with my  
18 attorneys to make sure the settlement was fair.

19 8. Overall, I dedicated approximately 40-50 hours pursue the claims in this lawsuit.

20 9. I originally filed this case as a class action. I chose to do so instead of pursuing my  
21 own claims in an individual case or a Labor Commissioner claim. I understood that I might be  
22 responsible for some or all of Defendants' legal costs if the case was not successfully concluded.

23 10. After learning of the arbitration agreement, I understood the best thing for the other  
24 employees and the State of California was to keep pursuing the representative PAGA claims. I began  
25 the arbitration process so that I could prove my own claims in arbitration and then return to Court,  
26 still facing the same or similar risks I faced with a class action case, since I would remain the face of  
27 the PAGA representative case.

11. Even with knowledge of these risks, I was willing to go forward and to act on behalf of the State and aggrieved employees, but I was nervous about losing and having a judgment filed against me for costs, or losing job opportunities in the future.

12. Based on my review of the settlement terms, conversations with my attorneys, and my understanding of Defendants' operations, I believe the settlement in the case is fair and adequate and in the best interest of the employees covered by the settlement and the State of California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on 1/6/2026 | 4:01 PM PST, 2025, in California.

DocuSigned by:

*Leah Pauli*

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Leah Pauli