

Larry W. Lee (State Bar No. 228175)
Kristen M. Agnew (State Bar No. 247656)
Max W. Gavron (State Bar No. 291697)
Kwanporn "Mai" Tulyathan (State Bar No. 316704)
DIVERSITY LAW GROUP, P.C.
515 S. Figueroa Street, Suite 1250
Los Angeles, CA 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com
kagnew@diversitylaw.com
mgavron@diversitylaw.com
ktulyathan@diversitylaw.com

William L. Marder (State Bar No. 170131)
bill@polarislawgroup.com
Polaris Law Group
501 San Benito Street, Suite 200
Hollister, CA 95023
(831) 531-4214
(831) 634-0333 facsimile

Additional Counsel on Next Page

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MONTEREY**

DONNA BRADLEY, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

APARTMENT MANAGEMENT
CONSULTANTS, L.L.C., a limited liability
company; and DOES 1 through 50, inclusive,

Defendants.

CLASS ACTION

Case No.: 24CV002090

**DECLARATION OF JOE CASTRO IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT AGREEMENT**

Date:

Time:

Judge: Hon. Ian A. Rivamonte

DEPT.: 14

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DAVID YEREMIAN & ASSOCIATES, INC.

David Yeremian (State Bar No. 226337)
Natalie Haritounian (State Bar No. 324318)
535 N. Brand Blvd., Suite 705
Glendale, California 91203
Telephone: (818) 230-8380
Facsimile: (818) 230-0308

UNITED EMPLOYEES LAW GROUP, PC

Walter Haines (State Bar No. 71075)
5500 Bolsa Ave., Suite 201
Huntington Beach, CA 92649
Telephone: (310) 652-2242

MARA LAW FIRM, PC

David Mara, Esq. (State Bar No. 230498)
Jill Vecchi, Esq. (State Bar No. 299333)
2650 Camino Del Rio North, Suite 302
San Diego, California 92108
Telephone: (619) 234-2833
Facsimile: (619) 234-4048

MOLTENI EMPLOYMENT LAW

Cristina Molteni, Esq. (State Bar No. 244715)
100 Pine Street, Suite 1250
San Francisco, California 94111

THE BYRNE LAW GROUP

Adrian Byrne, Esq. (State Bar No. 304020)
8605 Santa Monica Boulevard, Suite 48497
West Hollywood, California 90069

Attorneys for Plaintiffs the Class

DECLARATION OF CLASS REPRESENTATIVE JOE CASTRO

I, JOE CASTRO declare as follows:

1. I am a competent adult, over the age of eighteen, and a Class Representative Plaintiff in the matter *Bradley v. Apartment Management Consultants, L.L.C. et al.* The following declaration is based on my personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. I worked for Defendant as a non-exempt hourly employee from approximately March 2019 through February 2021.

3. I am familiar with the work involved in prosecuting the Class Action against my former employer Apartment Management Consultants, LLC. I have had numerous meetings with my attorneys. I am familiar with the claims made, the mediation proceedings, and settlement discussions, and have participated in all stages of the litigation up to and including preparation for preliminary approval of the settlement on behalf of the class.

4. When I worked for Defendant, I was subjected to the same Labor Code claims involving failure to pay minimum wage, failure to pay overtime wages, failure to provide compliant rest breaks or rest break premium pay, failure to provide compliant meal periods or meal break premium pay, failure to timely pay wages during employment or upon separation and for waiting-time penalties, failure to indemnify reasonable and necessary business expenses, failure to provide accurate, itemized wage statements, and unfair competition as the other Class Members.

5. I have and will continue to adequately represent the interests of all members of the proposed class I seek to represent. My claims are typical of these Class Members and involve the same common issues. I have no interests that are inconsistent with any of these Class Members.

6. I have always considered the interests of the other Class Members just as I have my own interests and understand that I must put the interests of the other Class Members before my own. I have participated, and will continue to participate, in this lawsuit up to and through the time of judgment. I have volunteered to represent the other Class Members because of the

importance of the case and so that other Class Members can benefit from the enforcement of the law and the savings of time, money, and effort that come from settling this case on a class basis.

7. I believe that the settlement obtained on behalf of the class is fair and reasonable in view of the issues and risks involved with the case.

8. I believe that the Class Representative Service Payment of \$10,000.00 for me is fair and reasonable. This payment takes into consideration the time, effort, risks, stress, and sacrifice of signing a general release of all claims over just wage and hour claims as well as the benefit provided to all Class Members as a result of my involvement in this litigation.

9. I have spent approximately 30 hours on this case. This includes the initial time I spent investigating these claims and all work for this litigation, which lasted over thirty months, meeting with my attorneys, the mediation preparation and participating in the mediation, and all follow-up work with my attorneys. I believe I have been diligent and acted above and beyond that which is expected of a Class Representative throughout all stages of the litigation and will continue to do so up to and including final approval of the settlement.

10. Furthermore, it is my opinion that the service payment is fair and reasonable because in addition to the many hours spent participating in this case, I accepted the potential risk of being liable for the opposing parties' costs if we were unsuccessful in this lawsuit. My attorneys told me these costs could be tens of thousands of dollars or more based on the type of case involved and length of the litigation. I believed in this case and was willing to be a Class Representative knowing the risks involved.

11. I signed a general release, so I am not only giving up my wage and hour claims, but I am also giving up all claims I had against my former employer. Since I have signed a general release for any and all claims related to my employment with Defendant, I cannot pursue any other claims against Defendant.

12. This decision posed other risks for me, too, and I did not make the decision to become involved in this class action lightly. I was concerned about the attention a publicly filed lawsuit, and especially a class action, would attract. My name would be associated with a lawsuit that I filed against my employer. I was aware that it is possible, and relatively easy, to perform

background checks of publicly filed documents on the internet, sometimes with nothing more than a simple Google search. Attached as **Exhibit A** is a true and correct copy of the results of a search of “Castro v. Apartment Management Consultants” entered on Google.com, accessed on September 10, 2026. I was mindful that prospective employers might find out that I sued a former employer, and that this could hurt my employability in the future. I believed in this case and was willing to be a Class Representative Plaintiff knowing the risks involved.

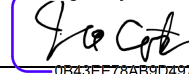
13. This litigation has also resulted in a valuable benefit to the Class Members who will participate in the monetary payout of this Settlement because of my involvement. This is a great benefit to all Class Members. Further, Class Members who are current employees will benefit from the policy changes that Defendant has agreed to make as part of the Settlement.

14. Based on the time, risk, stress, sacrifice of signing of a general release, and the great outcome of this and monetary payout, I believe that the requested service payment is fair and reasonable. As such, I respectfully request that the Court award the requested Class Representative Service Payment of \$10,000.00.

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

Executed on 9/10/2026 at San jose, California.

Signed by:



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Joe Castro