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**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.

Case No.: 24CV002090

**DECLARATION OF CRISTINA MOLteni IN
SUPPORT OF PLAINTIFFS’ MOTION FOR
PRELIMINARY APPROVAL OF CLASS AND
PAGA ACTION SETTLEMENT,
CONDITIONAL CERTIFICATION,
APPROVAL OF CLASS NOTICE, SETTING
OF FINAL APPROVAL HEARING DATE**

Date: October 16, 2026

Time: 8:30 a.m.

Judge: Hon. Ian A. Rivamonte

Dept.: 14

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1 I, Cristina Molteni, declare as follows:

2 1. I am a member of the Bar of the State of California and am admitted to practice
3 before this Court. I am the principal in the law firm of Molteni Employment Law (“MEL”),
4 counsel of record for Plaintiff Kevin Nikaido and the proposed Class in this action. I submit this
5 declaration in support of Plaintiff’s Motion for Preliminary Approval of Class and PAGA Action
6 Settlement, Conditional Certification, Approval of Class Notice, Setting of Final Approval
7 Hearing Date. I have personal knowledge of the facts set forth in this declaration and, if called
8 upon to do so, could and would testify competently thereto, except where I make a statement on
9 information and belief, in which case I am informed and believe the statement to be true.

10 2. In or around May 2024, I associated with Mara Law Firm, P.C. to jointly prosecute
11 this case on behalf of Plaintiff Nikaido, and the purported class.

12 **Professional Background and Experience**

13 3. The following is a brief description of my professional background. I have more
14 than thirty years of experience in the labor and employment field; twenty-two of those years were
15 as an attorney. I graduated from Facultad de Derecho y Ciencias Sociales, Universidad de Buenos
16 Aires, Argentina in May 1992, with a certification in Labor & Employment Law. I received my
17 LL.M. in Labor and Employment Law from Universidade de São Paulo, Brazil in November 1998
18 and my LL.M. in International Law (with honors) from Golden Gate University School of Law in
19 2009. Prior to coming to California, I was a law clerk in the National Labor Court of Appeals in
20 Buenos Aires, Argentina and an assistant professor of Labor and Employment Law I and II (with
21 tenure) in Faculdade de Direito, Universidade Cândido Mendes, Rio de Janeiro, Brazil, the oldest
22 private university in Latin America. I obtained my license to practice law in Argentina in 1996,
23 in Brazil in 1998, and in California in 2006.

24 4. From April 2008 until December 2011, I was an associate at the Law Offices of
25 Ellyn Moscovitz, P.C. (currently closed) in Oakland, where I worked on more than 30 wage-and-
26 hour class action cases, primarily representing Spanish-speaking workers in the building trades.
27 From January 2012 until July 2013, I was an associate at Rukin Hyland Doria & Tindall LLP
28 (currently Rukin Hyland & Riggin, LLP) in San Francisco, practicing employment law and

1 focused in class action litigation. From July 2013 to November 2015, I was a partner in the
2 employment practice at Albert G. Stoll, Jr., A Law Corporation in San Francisco, mostly
3 representing Spanish-speaking workers in wage-and-hour class action litigation. From November
4 2015 to the present, I have been the principal at MEL, representing clients exclusively in
5 employment law matters, including litigating individual and class action wage- and-hour claims,
6 and providing advice in workplace issues. I was a contributing author on the class action yearly
7 issues in Plaintiff Magazine (Northern California) and CAALA (Consumer Attorneys Association
8 of Los Angeles) Advocate Magazine (Southern California), and I have been named a Northern
9 California “Super Lawyer” by Super Lawyers, a rating service of outstanding lawyers who have
10 attained a high-degree of peer recognition and professional achievement. (2016 Rising Star; 2021-
11 2026 Super Lawyer). In 2026 I have also received the AV Preeminent Peer Review Rating from
12 Martindale-Hubbell, its highest peer-review rating, awarded to attorneys who receive strong peer
13 recognition for legal knowledge, communication skills, and ethical standards. I have been a
14 member of California Employment Lawyers Association (“CELA”) since 2008. Since late 2023,
15 I have been serving as the co-chair of CELA’s Immigrant Employee Rights Committee. In October
16 2025, I received CELA’s Leadership Award in recognition of my leadership in singly leading
17 CELA's Immigrant Employee Rights Committee.

18 5. I have served as lead class counsel, co-lead class counsel, and other levels of
19 involvement in various class action employment cases in federal and state courts. The following
20 is a sampling of class actions in which I have been appointed as class counsel:

- 21 • *Miranda et al. v. Davey Roofing, Inc. et al.*, Alameda Sup. Ct., Case No. 06282104;
- 22 • *Rodriguez et al. v. CRC Roofing*, Sacramento Sup. Ct., Case No. 34-2008-00014843;
- 23 • *Masters v. Vellutini Corporation dba Royal Electric*, Sacramento Sup. Ct., Case No. 34-
24 2008-00011148;
- 25 • *Diaz et al. v. Cool Roofing Systems dba TSP Roof Systems*, Alameda Sup. Ct., Case No.
26 RG11555440;
- 27 • *May v. Central Towing & Transport, LLC*, Alameda Sup. Ct., Case No. RG11578842;
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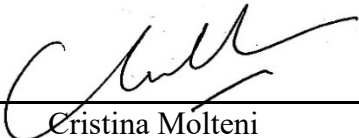
- 1 • *Vizcaino et al. v. Tecta America Sacramento, Inc. et al.*, Contra Costa Sup. Ct., Case No.
- 2 C11-00871;
- 3 • *Millan et al. v. Gudgel Roofing, Inc. dba Yancey Roofing*, Contra Costa Sup. Ct., Case
- 4 No. C12-01818;
- 5 • *Romero et al. v. Legacy Roofing & Waterproofing, Inc. et al.*, Alameda Sup. Ct., Case
- 6 No. RG12634384;
- 7 • *Reynoso et al. v. Madsen Roofing & Waterproofing, Inc.*, Sacramento Sup. Ct., Case No.
- 8 34-2013-00156515;
- 9 • *Leon et al. v. D7 Roofing Services, Inc. et al.*, Alameda Sup. Ct., Case No. RG14749708;
- 10 • *Tovar v. NIR West Coast, Inc. dba Northern California Roofing Co. et al.*, Contra Costa
- 11 Sup. Ct., Case No. C17-01600;
- 12 • *Neill et al. v. Vernon Construction & Roofing, Inc. et al.*, Stanislaus Sup. Ct., Case No.
- 13 2130258;
- 14 • *Lopez v. Swanson Landscaping, Inc. et al.*, Alameda Sup. Ct., Case No. RG20062042;
- 15 • *Aguilar et al. v. All Seasons Roofing & Waterproofing, Inc.*, Santa Clara Sup. Ct., Case
- 16 No. 20CV364524;
- 17 • *Smith et al. v. Lush, Inc.*, San Francisco Sup. Ct., Case No. CGC-20-584125;
- 18 • *Ramos et al. v. Davidon Homes et al.*, Contra Costa Sup. Ct., Case No. C23-01240;
- 19 • *Solis Hernandez et al. v. LaBella's Pool Service & Supplies, Inc. et al.*, Alameda Sup.
- 20 Ct., Case No. 22CV015731.

21 6. In reaching the Settlement, I assessed all of the risks of continued pursuit of this
22 litigation and a number of related factors, including the risk of failing to certify a class for trial and
23 the risk of failing to demonstrate one or more claims at trial. I also considered the fact that litigating
24 each of the class claims through trial would involve substantial additional discovery, including
25 depositions of Defendants' officers and management personnel and further written discovery.
26 Although Plaintiff's Counsel is more than willing to engage in such discovery if the case requires
27 us to do so, it would involve substantial additional time and expense to complete.

28 7. Based on the disclosures that I have received, my calculation of the potential

1 damages at issue in this case, and my assessment of the risks that Plaintiffs and the proposed Class
2 might not prevail on one or more of their claims or certify the Class through trial, I believe the
3 parties have reached a fair, reasonable, and adequate settlement, and I fully support it. Accordingly,
4 I strongly recommend that the Court grant preliminary approval to the settlement at issue in this
5 motion.

6 I declare under penalty of perjury under the laws of the United States and the State of California
7 that the foregoing is true and correct, executed on September 18, 2026.

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12 Cristina Molteni
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