

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 DAVID YEREMIAN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: October 16, 2026

Time: 8:30 a.m.

Judge: Hon. Ian A. Rivamonte

DEPT.: 14

1 **DAVID YEREMIAN & ASSOCIATES, INC.**

David Yeremian (State Bar No. 226337)

2 Natalie Haritounian (State Bar No. 324318)

3 535 N. Brand Blvd., Suite 705

Glendale, California 91203

4 Telephone: (818) 230-8380

Facsimile: (818) 230-0308

5 **UNITED EMPLOYEES LAW GROUP, PC**

6 Walter Haines (State Bar No. 71075)

7 5500 Bolsa Ave., Suite 201

Huntington Beach, CA 92649

8 Telephone: (310) 652-2242

9 **MARA LAW FIRM, PC**

David Mara, Esq. (State Bar No. 230498)

10 Jill Vecchi, Esq. (State Bar No. 299333)

11 3160 Camino Del Rio South, Suite 207

San Diego, California 92108

12 Telephone: (619) 234-2833

Facsimile: (619) 234-4048

13 **MOLTENI EMPLOYMENT LAW**

14 Cristina Molteni, Esq. (State Bar No. 244715)

15 100 Pine Street, Suite 1250

San Francisco, California 94111

16 **THE BYRNE LAW GROUP**

17 Adrian Byrne, Esq. (State Bar No. 304020)

18 8605 Santa Monica Boulevard, Suite 48497

West Hollywood, California 90069

19 Attorneys for Plaintiffs the Class

DECLARATION OF DAVID YEREMIAN

I, David Yeremian, declare as follows:

1. I am an attorney licensed and admitted to practice before all courts of the State of California, the United States District Court for the Central, Southern, Eastern, and Northern Districts of California, and the Ninth Circuit Court of Appeals. I am the managing attorney of David Yeremian & Associates, Inc., counsel for Plaintiffs Marylourdes Hormigas and Joe Castro (“Plaintiffs”) on behalf of himself and similarly situated employees of Defendant Apartment Management Consultants, LLC (“Defendant”). I and my firm are referred to herein as Class Counsel. I have personal knowledge of the facts herein and if called as a witness, I could and would competently testify.

2. I graduated from UC Berkeley in 1997 and received my law degree and MBA from UCLA in 2001. I am a member of the Los Angeles County Bar Association and the California Employment Lawyers Association. I have been honored as a Super Lawyers Rising Star in 2009, 2010, 2012-2015. I have been named and honored as a Super Lawyer since 2016.

3. I am experienced in prosecuting employment matters, particularly class actions. In addition to the present case, I am also class counsel for dozens of other putative wage-and-hour class-action lawsuits pending in various state and federal jurisdictions throughout California.

4. My extensive experience in litigating employment wage and hour matters has been integral in identifying legal issues, evaluating the strengths and weaknesses of a case, and generally negotiating fair and reasonable class action settlements. Practice in the narrow field of wage and hour litigation requires skill and knowledge concerning the constantly evolving substantive law (state and federal), as well as the procedural law of class action litigation. In this action, I am fully equipped to use the skills and knowledge I have developed through more than a decade of prosecuting and defending wage and hour class actions to fairly and adequately represent the interests of the Class. Therefore, on the account of my resources, experience, and knowledge, I am well qualified to act as Class Counsel and represent Plaintiffs and the putative Class Members in this action.

5. In the last several years I have had several contested class cases certified. When

1 necessary, we pursue cases on appeal. Owing to my experience, I am well qualified to evaluate the
2 class claims in this action, to evaluate settlement v. trial and defenses raised. I have negotiated
3 over 100 class action settlements, including many involving the same issues presented in this case.
4 A selection of cases wherein I have served as lead or co-lead class counsel includes: *Galavis v.*
5 *Patina Restaurant Group, LLC* (LASC BC375225; class size approx. 10,000; co-lead counsel);
6 *Milford v. ADT Security Services, Inc.* (CACD CV08-2236; class size approx. 2,000; lead
7 counsel); *Carreon v. Wolfgang Puck Catering and Events, LLC* (LASC BC398569; class size
8 approx. 1,400; lead counsel); *Fluke v. RFG Oil, Inc.* (LASC BC403354; class size approx. 1,400;
9 lead counsel); *Urena v. Camachos Restaurant* (LASC BC365913; class size approx. 887; lead
10 counsel); *Smith v. Rio Rancho Pontiac GMC Buick Inc.* (LASC BC391187; class size approx. 860;
11 lead counsel); *Callela v. Dolce Group* (LASC BC364711; class size approx. 600; lead counsel);
12 *Vasquez v. The Hollywood Pig n Whistle LP* (LASC BC335075; class size approx. 600; lead
13 counsel); *Goldman v. Aorta Restaurant Operating LP* (LASC BC379688; class size approx. 300;
14 lead counsel); *Sink-Crilly v. Centex Homes* (CACD CV09-2476; class size approx. 250; lead
15 counsel); *Utley v. Cranbrook Partners Inc.* (LASC BC392813; class size approx. 200; lead
16 counsel); *Garcia v. California Credits Group* (LASC BC353213; class size approx. 160; lead
17 counsel); *Afanasyev v. Miller Infiniti, Inc.* (LASC BC350788; class size approx. 160; lead
18 counsel); *Morris v. Gymboree, Inc.* (LASC BC393270; class size approx. 150; lead counsel);
19 *Ortega v. AJC Sandblasting, Inc.* (LASC BC378806; class size approx. 140; lead counsel);
20 *Lulejyan v. Jim Falk Motors of Beverly Hills, Inc.* (LASC BC398459; class size approx. 72; lead
21 counsel); *Rylko v. The Griddle Café, Inc.* (LASC BC386126; class size approx. 70; lead counsel);
22 *Healy v. Siemens IT Solutions and Services, Inc.* (Santa Clara Superior Court 108CV113479; class
23 size approx 60; lead counsel).

24 6. This Declaration is offered in support of Plaintiffs' motion for preliminary approval
25 of a settlement agreement negotiated and entered into at arm's length by the parties herein.

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

28 Executed this 18th day of September 2026 at Glendale, California.

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