

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

Attorneys for Plaintiff and the Class

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.

Case No.: 24CV002090

**DECLARATION OF LARRY W. LEE IN
SUPPORT OF PLAINTIFFS’ MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date: October 16, 2026

Time: 8:30 a.m.

Judge: Hon. Ian A. Rivamonte
DEPT.: 14

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

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I, Larry W. Lee, declare as follows:

1. I am an attorney at law, duly licensed to practice before all Courts in the State of California, and am with the law firm Diversity Law Group, P.C., counsel of record for Plaintiffs Donna Bradley (“Plaintiff Bradley”), Marylourdes Hormigas, Joe Castro and Kevin Nikaido (“Nikaido”). I have personal knowledge of the facts set forth below and if called to testify I could and would do so competently.

2. I am one of the primary attorneys on this matter. I have independently evaluated the evidence, the applicable law, and the possible outcomes of continued litigation. In my judgment, Plaintiffs' claims have substantial merit and a reasonable likelihood of success. Nevertheless, a favorable result was not assured. Apartment Management Consultants, LLC ("Defendant" or "AMC") disputes liability and could challenge whether the alleged violations could be proven on a class-wide basis, the amount of any recoverable damages, and the availability and amount of statutory and PAGA penalties. Plaintiffs would also have faced the risks associated with class certification, dispositive motions, trial, posttrial proceedings, and appeal. Litigating those issues to conclusion would require considerable additional time and expense and could delay any recovery for years. The settlement was reached only after the Parties had investigated the claims, exchanged informal discovery, participated in mediation, and engaged in arm's-length negotiations. In my opinion, the settlement represents a well-informed compromise that preserves a meaningful recovery for the Class and PAGA Employees while avoiding the uncertainty and delay of further litigation. I therefore believe the settlement is fair, reasonable, adequate, and in their best interests.

3. This Action has been prosecuted entirely on a contingency fee basis. Neither I nor any member of my firm has received any compensation for the substantial time devoted to the litigation. For more than two years, Class Counsel has borne the risk that we would receive no recovery whatsoever despite investing significant attorney time and advancing all litigation costs necessary to prosecute the Action. That risk was particularly significant here. The Action involved substantial legal and factual challenges. Had Plaintiffs not prevailed, Class Counsel would not

1 have recovered any attorneys' fees and would have absorbed the entirety of the time and resources
2 devoted to the case. Moreover, all litigation costs were advanced by Class Counsel with no
3 guarantee of reimbursement.

4 4. My qualifications are as follows: I received my J.D. from Arizona State
5 University College of Law in 2003. During law school, I was a summer associate at the law firm
6 of Brobeck, Phleger & Harrison. I graduated *cum laude* from Arizona State University College of
7 Law in the top 10% of my class. While I was in law school, I was the Associate Managing Editor
8 of the Arizona State University College of Law, Law Journal. Upon graduation, I practiced law as
9 an associate at the Los Angeles County offices of Ogletree Deakins Nash Smoak & Stewart, P.C.,
10 a national employment defense law firm that represents a significant number of Fortune 500
11 companies.

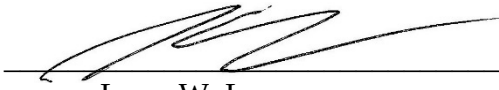
12 5. My firm's primary focus is employment law. I have handled a number of wage
13 and hour matters including class actions and multiple-plaintiff actions. I have a practice that
14 encompasses cases throughout the State of California, including but not limited to the Los Angeles
15 Superior Courts, the Orange County Superior Courts, the San Francisco County Superior Courts,
16 the San Diego County Superior Courts, and the United States District Courts for the Central,
17 Eastern, Northern, and Southern Districts of California.

18 6. I have been named as class counsel in a number of class actions that have been
19 granted final approval by the Superior Courts of Los Angeles County, Orange County, San
20 Francisco County, Alameda County, Contra Costa County, Monterey County, San Bernardino
21 County, Santa Clara County, Sonoma County, and other counties, as well as the United States
22 District Court for the Central, Eastern, and Northern Districts of California, including but not
23 limited to the following class actions: *Chan Lanier v. Citigroup, Inc. et al.*, San Francisco Superior
24 Court Case No. CGC-05-445143; *Naqvi v. Acoustic Home Loans et al.*, Orange County Superior
25 Court Case No. 05CC00263; *Ortega v. AIG*, Central District of California Case No. CV 06-0196-
26 RSWL (PJWx); *Universal Protection Overtime Cases*, Orange County Superior Court, Judicial
27 Council Coordination Proceeding No. 4480; *Hernandez v. CVS Corp. et al.*, Judicial Council
28 Coordination Proceeding No. 4539; *Padilla v. Safeway*, San Benito County Superior Court Case

1 No. CU-16-00182; *Valles v. Community Hospital of the Monterey Peninsula*, Monterey County
2 Superior Court Case No. 17CV003452; *DirecTv Wage and Hour Cases*, Santa Clara Superior
3 Court Judicial Council Coordination Proceeding No. 4850; *Perez v. Standard Drywall, Inc.*,
4 Alameda County Superior Court Case No. RG15761142; and *Davis v. Nugget Market, Inc.*, Yolo
5 County Superior Court Case No. CV-18-558.

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

8 Executed on this 21st day of September 2026, at Los Angeles, California.

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12 Larry W. Lee
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