

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 Plaintiff Kevin Nikaido and the Class

**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 PLAINTIFF KEVIN
NIKAIDO IN SUPPORT OF SETTLEMENT
APPROVAL**

I, KEVIN NIKAIDO, declare as follows:

1. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.
2. I am a named Plaintiff and Class Representative in the above-captioned lawsuit, and I submit this declaration in support of settlement approval.
3. I worked for Apartment Management Consultants, LLC (“AMC”) as a non-exempt hourly employee in California from approximately November 17, 2023, to approximately December 19, 2023.
4. I bought this action to redress certain employment claims that I had against AMC.
5. I had many meetings and conversations with my attorneys about my experience working for AMC.
6. Since becoming a class representative, I have diligently worked on this case.
7. Throughout the case, I regularly talked with my attorneys. I always answered phone calls from my attorneys or called them back promptly when they called. I also promptly responded to emails sent by my attorneys.
8. I also looked for documents from my employment with AMC and provided my attorneys with all documents I found. I have worked hard to help move the case forward.
9. I assisted my attorneys in investigating the case and reached out to them to provide them with information about my time working for AMC that I thought might help the case.
10. I was aware that, at some point in this case, I would have my deposition taken. I knew that the deposition could take a full day and that I may have to meet with my attorneys prior to my deposition. I was at all times ready and willing to sit for my deposition.
11. Although I did not attend the mediation in person, I was available on the phone. I gave my consent to settle with AMC for the gross settlement amount of \$1,735,000. I completely and carefully reviewed the settlement agreement. I then signed the settlement agreement.

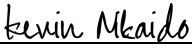
12. In light of the work I performed in this case and the duties associated with being a class representative in a case of this magnitude, I believe the \$10,000 class representative enhancement award is reasonable. I understand that this additional payment is not guaranteed and is subject to Court approval.
13. I have and will continue to adequately represent all of the interests of the class. With my status as class representative, I will treat the interests of the Class above my interests.
14. I initiated this lawsuit on behalf of myself and the other employees because I wanted to fix what I perceived as problems affecting all of us. From the very beginning, I understood that I was participating in this case, not only for my own benefit, but for the many past and present hourly employees.
15. While I believe that I was doing the right thing in pursuing this case, I do believe that I have paid a price for the greater good of other employees, who will now obtain some relief through the terms of the proposed settlement.
16. I understood that my own claim for damages would be delayed by proceeding in an action for all other employees in my position. With this understanding, I agreed to file the case as a class action, with me as its representative.
17. As part of the settlement, I agreed to a general release of my claims against Defendant. This release is broader than the release being given by other Class Members.
18. I also understood that there were other risks involved in bringing this kind of lawsuit, especially when it could prove so costly to AMC. I was aware that, if I brought an action, I might be responsible for some or all of AMC's legal costs in this matter if the case was not successfully concluded. I was also aware that being a class representative in this case could compromise future employment opportunities. Even with that knowledge, I was willing to go forward and represent the class, because I felt AMC was wrong in its employment practices and policies.

1 19. My claims are typical of the Class Members because I am similarly situated to all hourly,
2 non-exempt employees who were employed by AMC at any time from March 19, 2020, to
3 December 31, 2025. Thus, my interests are the same as all members of the Class.

4 20. I recognize that any resolution of this matter must be approved by the Court in terms of
5 whether the settlement is fair and reasonable, and that I am obligated to protect the interests
6 of all of Class Members for the Class Period.

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

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10 Date: 7/6/2026

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12 DocuSigned by:
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14 KEVIN NIKAIIDO
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