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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 ADRIAN BYRNE 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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17 **THE BYRNE LAW GROUP**

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

8605 Santa Monica Boulevard, Suite 48497

19 West Hollywood, California 90069

20 Attorneys for Plaintiffs the Class

1 I, Adrian C. Byrne, declare as follows:

2 1. I am an attorney licensed to practice before all of the courts of the State of
3 California. I am counsel of record for Plaintiff Kevin Nikaido and the proposed Class in this
4 action in the above-captioned matter.

5 2. I submit this declaration in support of Plaintiff's Motion for Preliminary
6 Approval of Class and PAGA Action Settlement, Conditional Certification, Approval of Class
7 Notice, Setting of Final Approval Hearing Date. I have personal knowledge of the facts set
8 forth in this declaration and, if called upon to do so, could and would testify competently
9 thereto, except where I make a statement on information and belief, in which case I am
10 informed and believe the statement to be true.

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

13 4. The following is a brief description of my legal background: I graduated from
14 Bristol Law School in the United Kingdom and was called to the Bar of England and Wales in
15 2010. In 2013, I became licensed to practice as a Solicitor of England and Wales. I
16 subsequently became licensed as an attorney in California in 2015.

17 5. For over 11 years, I have worked exclusively on employment law with a focus
18 on representative PAGA and class wage and hour cases. During that time, I estimate that I have
19 litigated over 60 representative PAGA and/or class wage and hour actions.

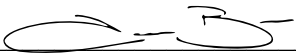
20 6. I have been selected for several years to Southern California Super Lawyers -
21 Rising Star list in the category of "Employment Litigation Plaintiff".

22 7. In reaching this settlement, I assessed the risks of continuing with the litigation
23 and other considerations including the possibility that the Court would decline to certify a class
24 or would decertify it before trial, and the possibility that Plaintiff would not prevail at trial on
25 some or all of the claims. In addition, I weighed the substantial work that would be required in
26 pursuing the class claims through trial, including extensive further discovery, including
27 depositions of Defendants' officers and management-level employees and additional written
28

1 discovery. Plaintiff's Counsel remain prepared to undertake that discovery should the case
2 require it, but doing so would add considerable time and expense to the litigation and postpone
3 any recovery for the proposed Class members.

4 8. Based upon my knowledge of the facts of this case, and my evaluation of the
5 strengths and challenges of Plaintiff's claims and Defendants' defenses, I believe this
6 Settlement represents a fair and reasonable settlement of these claims.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct. Executed on September 18, 2026.

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12 _____
13 Adrian C. Byrne
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