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Attorneys for Plaintiff
JOSE GOMEZ, individually and on behalf of
the putative class

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF IMPERIAL

JOSE GOMEZ, individually and on behalf of
the putative class,

Plaintiff,

v.

MANAGEMENT & TRAINING
CORPORATION, a Delaware corporation; and
DOES 1- 50, Inclusive,

Defendants.

CASE NO.: ECU003580

CLASS ACTION

*[Assigned for all purposes to the Honorable
Jeffrey B. Jones, El Centro Dept. 5]*

**DECLARATION OF DANNY YADIDSION
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

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1. I am an attorney at law, duly licensed and admitted to practice before all courts of the State of California. I am a shareholder of the law firm Labor Law PC and counsel of record for Plaintiff JOSE GOMEZ ("Plaintiff" or "Class Representative"), individually and on behalf of similarly situated employees of Defendants MANAGEMENT & TRAINING CORPORATION and related entities ("Defendants"). I and my firm are referred to herein as Class Counsel. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would competently testify.

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1 approved my request to represent a class of exempt employees whom Plaintiff alleges were
2 misclassified. (*Archer v. Jack Nadel Inc.*, Los Angeles County Superior Court, Case No.
3 18STCV07761). In addition, I have been appointed as class counsel for purposes of settlement in
4 other class actions including *Troy Richard Whitmark, et al. v. Altman Specialty Plants, Inc.* (San
5 Diego County Superior Court, Case No. 37-2018-00055889-CU-OE-NC), *Antonio Llamas v. Mapfre*
6 *Insurance & Subsidiaries, et al.* (Alameda County Superior Court, Case No. RG 18931346), *Joyce*
7 *Patton, et al. v. All-City Management Services, Inc.* (Los Angeles County Superior Court, Case No.
8 BC723958), *Rafael Becerra, Jr. v. Superior Home Design, Inc.* (Los Angeles County Superior Court,
9 Case No. 19STCV17368), *Marie Barraza, et al. v. MOGA Transport, Inc.* (Kern County Superior
10 Court, Case No. BCV-20-103017), *Walter Jimenez v. Bay Cities Partners, Inc.* (Los Angeles County
11 Superior Court, Case No. 20STCV40788), *Carrie Baldwin v. Patagonia, Inc.* (Los Angeles County
12 Superior Court, Case No. 20STCV40245), *Wess Neatherlin, et al. v. Zogsports Holding LLC* (Los
13 Angeles County Superior Court, Case No. 20STCV21901), and *Alex Furtado v. Bamia 2, LLC* (Los
14 Angeles County Superior Court, Case No. 21STCV37585).

15 4. Throughout my legal career, I have exclusively practiced employment law with a
16 specific focus on litigating wage and hour class actions. Prior to becoming a partner of Labor Law
17 PC, I exclusively practiced employment law for over nine years at defense firms. From approximately
18 December 2011 to September 2018, I exclusively practiced employment law and defended numerous
19 class actions at Jackson Lewis PC in Los Angeles. From June 2009 to December 2011, I exclusively
20 practiced employment law and defended numerous class actions at Lewis Brisbois Bisgaard & Smith
21 LLP in Los Angeles. I graduated from UCLA School of Law in May 2008. During law school, I also
22 learned about litigating wage and hour class actions while I worked at an employment litigation
23 boutique firm (Gleason & Favarote LLP). I have been responsible for numerous wage and hour class
24 actions throughout the State of California, in both state and federal courts. Throughout my legal
25 career, I have been responsible for all facets of class actions from the initial investigation of the
26 allegations through successful resolution. By way of example, shortly prior to leaving Jackson Lewis
27 PC, I successfully prevailed on a motion for class certification on behalf of my clients in a case heavily
28 litigated for over 7.5 years and successfully moved to dismiss a complaint in federal court based on

1 the federal enclave doctrine. (See *Compton v. American Management Services*, Los Angeles County
2 Superior Court, Case No. BC 448343; *Issac Tafoya v. AECOM, Inc. et al.*, Case No. 2:18-cv-04113-
3 GW-PLA (C.D. Cal. June 15, 2018.)

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

13 6. I do not believe that I have any conflicts of interest with the Class or the Class
14 Representatives. I am not related to the Class Representatives. Other than the Class Representatives,
15 I am unaware of any other member of the class, and I do not believe I have any conflict with any class
16 members. I have not previously represented Defendants in any matter. I am also not aware of any
17 potential conflict between me, Defendants, Defendants' counsel, or anyone else. I attest that the
18 Parties reached a settlement after extensive, arm's length settlement negotiations.

19 7. I attest that I have the requisite adequacy to act as Class Counsel and have an absence
20 of conflict. I respectfully submit that I and Labor Law PC are well suited to act as Class Counsel in
21 this action, and we have and will continue to vigorously represent the interests of the Class.

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1 I declare under penalty of perjury under the laws of the state of California that the foregoing
2 is true and correct. Executed on December 11, 2025, in Santa Monica, California.
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5 Respectfully Submitted,

6 DATED: December 11, 2025

LABOR LAW PC

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9 By: Danny Yadidsion
10 Attorney for Plaintiff
11 JOSE GOMEZ,
12 individually and on behalf of similarly situated
13 employees
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