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Attorneys for Plaintiff JEANNIE LEFEVRE

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

JEANNIE LEFEVRE, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

AG ARCADIA, LLC, a California limited
liability company DBA HUNTINGTON
DRIVE HEALTH AND REHABILITATION
CENTER; and DOES 1 through 100, inclusive,

Defendants.

Case No. 20STCV05550

*[Assigned for all purpose to the Hon. Michael L.
Stern, Dept. 62]*

**DECLARATION OF MILAN MOORE IN
SUPPORT OF PLAINTIFF'S MOTION FOR
SETTLEMENT APPROVAL OF CLAIMS
BROUGHT UNDER THE PRIVATE
ATTORNEYS GENERAL ACT AND
REASONABLE ATTORNEYS' FEES, COSTS,
AND ENHANCEMENT AWARD**

Reservation ID: 712266163113

Date: March 2, 2021
Time: 8:30 a.m.
Dept.: 62

*[Filed concurrently with:
Notice of Motion and Motion for Settlement Approval
of Claims Brought Under the Private Attorneys
General Act and Reasonable Attorneys' Fees, Costs,
And Enhancement Award;
Declaration of Elizabeth Nguyen;
Declaration Scott M. Lidman;
Declaration of Paul K. Haines;
Declaration of Plaintiff Jeannie Lefevre;
Declaration of Jodey Lawrence of Phoenix Class
Action Administration Solutions;
[Proposed] Order and Judgment; and
Proof of Service]*

Action Filed: April 20, 2020
Trial Date: None Set

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Attorneys for Plaintiff JEANNIE LEFEVRE

1 I, MILAN MOORE, declare as follows:

2 1. I am an Associate with Lidman Law, APC, counsel for named Plaintiff Jeannie Lefevre
3 (“Plaintiff”) in the above-captioned matter. I am a member in good standing of the bar of the State of
4 California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this
5 declaration and could testify competently to them if called upon to do so.

6 2. I am a 2015 graduate of UConn School of Law. I was admitted to the California State Bar
7 in December 2015 after passing the bar exam on my first attempt. Since that time, I have practiced
8 exclusively in the area of employment litigation. Prior to joining Lidman Law, APC, I worked for an
9 employment litigation boutique, where I successfully represented employees in discrimination,
10 harassment, retaliation and wrongful termination cases in both state and federal court. While non-
11 exhaustive, the type of work I performed included: conducting client intakes, performing pre-filing
12 research and analysis, drafting complaints, attending court hearings, corresponding with opposing
13 counsel, drafting and responding to written discovery, preparing for and taking and defending
14 depositions, drafting and opposing motions for remand, demurrers and motions to strike, motions to
15 compel, drafting mediation briefs, and attending mediations.

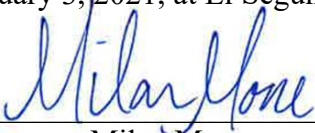
16 3. Since June 11, 2018, I have worked as an associate at my current firm, Lidman Law, APC.
17 I am currently staffed on approximately seventy (70) active wage and hour class action lawsuits in both
18 state and federal court.

19 4. I have been appointed Class Counsel in *Hanke v. C&W Facility Services, Inc.*, Case No.
20 CIVDS1814412, California Superior Court, County of San Bernardino, Honorable Judge David Cohn
21 presiding; *Molina v. Mader News, Inc.*, Case No. BC685960, California Superior Court, County of Los
22 Angeles, Honorable Judge Yvette M. Palazuelos presiding; *Alvarez v. Salamander Fire Protection, Inc.*,
23 Case No. BC688326, California Superior Court, County of Los Angeles, Honorable Judge William F.
24 Highberger presiding; *Fregoso v. Amerigas Propane, Inc.*, Case No. BC697973, California Superior
25 Court, County of Los Angeles, Honorable Rafael A. Ongkeko presiding; *Teran v. Western Plastics, Inc.*,
26 Case No. RIC1722619, California Superior Court, County of Riverside, Honorable Judge Sunshine Sykes
27 presiding; *Villegas de Torres v. El Monte Superstore Inc.*, Case No. BC688477, California Superior
28 Court, County of Los Angeles, Honorable Judge Daniel J. Buckley presiding; *Guzman v. Century Blinds,*

1 Case No. RIC1723654, California Superior Court, County of Riverside, Honorable Judge Sunshine S.
2 Sykes presiding; *George v. Convergence Marketing*, Case No. CIVDS1901039, California Superior
3 Court, County of San Bernardino, Honorable Judge David S. Cohn presiding; *Romero v. Fillmore*
4 *Hospitality, LLC*, Case No. BC705667, California Superior Court, County of Los Angeles, Honorable
5 Judge Maren E. Nelson presiding; *Davis v. WeDriveU*, Case No. 18CV322578, California Superior
6 Court, County of Santa Clara, Honorable Judge Brian C. Walsh presiding; *Acuna v. Canton Food Co.,*
7 *Inc.*, Case No. BC685001, California Superior Court, County of Los Angeles, Honorable Judge David S.
8 Cunningham presiding; and *Contreras v. Worldwide Flight Services, Inc.*, Case No. 2:18-cv-06036-PSG-
9 SS, United States District Court for the Central District of California, the Honorable Judge Philip S.
10 Gutierrez presiding.

11 5. The declaration of my co-counsel, Elizabeth Nguyen filed concurrently herewith, sets
12 forth the of the work completed in this case by attorneys in our co-counsel's firm and/or other attorneys
13 in my firm.

14 I declare under penalty of perjury under the laws of the State of California and the United States
15 that the foregoing is true and correct. Executed on February 3, 2021, at El Segundo, California.

16
17 
18 Milan Moore