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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF RIVERSIDE**

ROSALBA RAMIREZ, as an individual and  
on behalf of all others similarly situated,

Plaintiff,

vs.

MOLDED DEVICES, INC., a California  
corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Case No. RIC2001161

*[Assigned to the Honorable Craig G. Riemer in  
Dept. 1]*

**DECLARATION OF SCOTT M. LIDMAN IN  
SUPPORT OF MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT, CLASS REPRESENTATIVE'S  
SERVICE AWARD, AND ATTORNEYS' FEES  
AND COSTS**

Date: February 15, 2022  
Time: 8:30 a.m.  
Dept.: 1

Complaint Filed: March 11, 2020  
Trial Date: None Set

1 I, SCOTT M. LIDMAN, declare as follows:

2 1. I am a shareholder and principal of the law firm Lidman Law, APC, and counsel for the  
3 named Plaintiff Rosalba Ramirez (“Plaintiff”) and the proposed Settlement Class in the above-captioned  
4 matter. I am a member in good standing of the bar of the State of California and am admitted to practice  
5 in this Court. I have personal knowledge of the facts stated in this declaration and could testify  
6 competently to them if called upon to do so.

7 2. I am a 1998 graduate of Santa Clara University School of Law, where I graduated *summa*  
8 *cum laude*. During law school, I worked as a summer associate for the international employment law  
9 firm of Littler Mendelson, P.C., located in Los Angeles, California.

10 3. Since graduating from law school, my practice has focused exclusively on employment  
11 litigation. In September 1998, I began working as an associate attorney at the international law firm of  
12 Littler Mendelson P.C., at its Los Angeles office, which according to its website is the largest law firm  
13 in the world exclusively devoted to representing management in employment, employee benefits and  
14 labor law matters.

15 4. In 2000, I left Littler Mendelson to work at the Los Angeles office of Jones Day, which  
16 was at the time one of the largest international firms in the world. During my employment at Jones  
17 Day, I worked exclusively in the labor and employment department. In or around 2003, I went to work  
18 at the law firm of Loeb & Loeb, again working exclusively in the Labor & Employment department. In  
19 2008, I returned to Littler Mendelson, was promoted to Shareholder in 2009, and from 2008 until the  
20 end of 2017, I practiced exclusively labor and employment law, with a strong emphasis and most of my  
21 time working on wage and hour class actions venued in both state and federal courts. During that time  
22 and my legal career in general, I also worked on a number of single and multi-Plaintiff wage and hour  
23 matters as well.

24 5. During my employment at Littler Mendelson, I played a significant role in the class  
25 actions that I was staffed on, and ran many on my own both as an Of Counsel and as a Shareholder. In  
26 particular, I received a wide-array of wage and hour class action experience performing the following  
27 types of tasks: drafting demurrers, motions to strike and/or dismiss; removing actions from state court  
28 to federal court; drafting and responding to written discovery; drafting and opposing discovery related

1 motions; arguing discovery related motions; drafting motions to consolidate related matters;  
2 interviewing putative class members and obtaining declarations in connection with class certification;  
3 drafting oppositions to motions for class certification; drafting motions for decertification following  
4 class certification; conducting exposure analyses to assess the strengths and weaknesses of asserted  
5 claims, the likelihood of prevailing at class certification and potential damages resulting from such  
6 claims; drafting mediation briefs; serving as the primary contact to in-house counsel; deposing named  
7 plaintiffs and putative class members; deposing retained expert witnesses; and defending the depositions  
8 of corporate witnesses. I also was involved in the negotiations and settlements of many large wage and  
9 hour class actions. In short, I played an integral role in all aspects of litigation from the inception of a  
10 matter through and beyond class certification. I also supervised the work of several junior attorneys  
11 who were staffed on the same wage and hour class actions.

12 6. Although not exhaustive, below is a list of many of the wage and hour class and PAGA  
13 actions that I performed substantial work on while I was a shareholder at Littler Mendelson:

- 14 ► *Ortega v. J.B. Hunt Transport, Inc.*, Case No. 07-cv-8336-RGK-AFMx, United  
15 States District Court, Central District of California, Honorable Gary Klausner,  
16 presiding<sup>1</sup>.
- 17 ► *Aceves v. J.B. Hunt Transport, Inc.*, Case No. CIVDS1306133, California  
18 Superior Court, County of San Bernardino, Honorable Michael Sachs, presiding.
- 19 ► *Moreno v. J.B. Hunt Transport, Inc.*, Case No. BC388612, California Superior  
20 Court, County of Los Angeles, Honorable Mel Red Recana, presiding.
- 21 ► *Newcomb v. J.B. Hunt Transport, Inc.*, Case No. RG16815734, California  
22 Superior Court, County of Alameda, Honorable Winifred Smith, presiding.
- 23 ► *Vaquero v. Stoneledge Furniture, LLC, et al.*, Case No. 12-cv-08590-PA-MAN,  
24 United States District Court, Central District of California, Honorable Percy  
25 Anderson, presiding.

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28 <sup>1</sup> My work on this matter including proceedings not only in District Court, but also work before the United States Court of Appeals for the Ninth Circuit as well as the United States Supreme Court.

- 1           ▶ *Vaquero v. Stoneledge Furniture, LLC, et al.*, Case No. BC388612, California  
2           Superior Court, County of Los Angeles, Honorable Elihu Berle, presiding.<sup>2</sup>
- 3           ▶ *Dugan v. Stoneledge Furniture, LLC*, Case No. 16-cv-01125-PA-FFMx, United  
4           States District Court, Central District of California, Honorable Percy Anderson,  
5           presiding.
- 6           ▶ *Klune v. Stoneledge Furniture, LLC*, Case No. 14-cv-03986-PA-FFMx, United  
7           States District Court, Central District of California, Honorable Percy Anderson,  
8           presiding.
- 9           ▶ *Diaz v. ABM Industries, Inc.; Ampco Parking*, Case No. BC362932, California  
10          Superior Court, County of Los Angeles, Honorable Jane Johnson, presiding.<sup>3</sup>
- 11          ▶ *Adams v. Luxottica Retail North America, Inc.*, Case No. 07CC01346, California  
12          Superior Court, County of Orange, Honorable Thierry Patrick Colaw, presiding.
- 13          ▶ *Sakkab v. Luxottica Retail North America, Inc.*, Case No. 12-cv-00436-GPC-  
14          KSC, United States District Court, Southern District of California.<sup>4</sup>
- 15          ▶ *Page v. Oakley, Inc.*, Case No. FCS041512, California Superior Court, County  
16          of Solano, Honorable Paul Berman, presiding.
- 17          ▶ *Ramirez v. Oakley, Inc.*, Case No. 30-2014-00731617-CU-OE-CJC California  
18          Superior Court, County of Orange, Honorable William Claster, presiding.
- 19          ▶ *Ramirez v. Oakley, Inc.*, Case No. 30-2014-00723846-CU-DE-CXC, California  
20          Superior Court, County of Orange, Honorable William Claster, presiding.
- 21          ▶ *Sierra v. Oakley, Inc.*, Case No. 13-cv-00319-AG-JPR, United States District  
22          Court, Central District of California, Honorable Andrew Guilford, presiding.<sup>5</sup>
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26       <sup>2</sup> My work on this matter included proceedings not only in the trial court, but also before the California Courts  
27       of Appeal and the California Supreme Court.

28       <sup>3</sup> This matter was consolidated and litigated collectively with Case Nos. BC380923, BC 381523 and BC  
406663.

<sup>4</sup> The work I performed on this case included work in the United States Court of Appeals for the Ninth Circuit.

<sup>5</sup> The work I performed on this case included work in the United States Court of Appeals for the Ninth Circuit.

- 1 ► *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United  
2 States District Court, Central District of California, Honorable Margaret Morrow,  
3 presiding.
- 4 ► *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United  
5 States District Court, Central District of California, Honorable Margaret Morrow,  
6 presiding.
- 7 ► *Khelghatian v. Comerica Bank, et al.*, Case No. 11-cv-7689-DSF-FFMx, United  
8 States District Court, Southern District of California, Honorable John A.  
9 Houston, presiding.
- 10 ► *Babasa v. Comerica Bank, et al.*, Case No. 11-cv-0595-JAH-BGS, United States  
11 District Court, Central District of California, Honorable Margaret Morrow,  
12 presiding.
- 13 ► *Bernal v. Comerica Bank, et al.*, Case No. 11-cv-01298-JAH-BGS, United States  
14 District Court, Central District of California, Honorable Margaret Morrow,  
15 presiding.
- 16 ► *Khalili v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United  
17 States District Court, Northern District of California.
- 18 ► *Granata v. Comerica Bank, et al.*, Case No. 37-2011-00086316-CU-OE-CTL,  
19 California Superior Court, County of San Diego, Honorable Jeffrey B. Barton,  
20 presiding.
- 21 ► *Mathews v. Comerica Bank, et al.*, Case No. 111CV194781, California Superior  
22 Court, County of Santa Clara.
- 23 ► *Gallegos v. Comerica Bank, et al.*, Case No. BC455515, California Superior  
24 Court, County of Los Angeles, Honorable Terry Green, presiding.
- 25 ► *Rumohr v. Comerica Bank, et al.*, Case No. CGC-11-508433, California Superior  
26 Court, County of San Francisco.
- 27 ► *Smith v. Werner Enterprises*, Case No. 15-cv-02978-RS, United States District  
28 Court, Northern District of California, Honorable Richard Seeborg, presiding.

1           7.       In January 2018, I voluntarily resigned from Littler Mendelson in order to open my own  
2 law firm, Lidman Law, APC, to represent employees with work-related claims, including primarily  
3 wage and hour claims and almost exclusively on a class-action basis. I am the President and Shareholder  
4 of Lidman Law. Currently, over ninety percent (90%) of my practice is dedicated exclusively to the  
5 prosecution of wage and hour class actions, and I am currently responsible for prosecuting over sixty-  
6 five (65) wage and hour class actions filed in State courts throughout California, with several of them  
7 having been removed to Federal courts. I believe that my professional experience renders me more than  
8 qualified to serve as class counsel in this lawsuit involving claims of underpaid overtime and minimum  
9 wages, meal and rest period violations, and derivative penalty claims. Not only have I litigated dozens  
10 of wage and hour cases throughout my career involving similar claims, including the wage and hour  
11 class actions identified above, I have litigated similar claims from both Plaintiff and defense  
12 perspectives. As a result, I am able to realistically assess and evaluate the facts and legal arguments  
13 that can be made in pursuit and defense of similar wage and hour claims, as well as those facts and  
14 arguments in support and in opposition to class certification. Consequently, I am able to appreciate the  
15 significant risks, uncertainties, and delay involved in wage and hour class action litigation.

16           8.       I have been appointed Class Counsel in *Guardado v. Wesley Allen, Inc.*, Case No.  
17 BC683027, California Superior Court, County of Los Angeles, Honorable Judge Carolyn B. Kuhl  
18 presiding; *Rodriguez v. Satco, Inc.*, Case No. BC682137, California Superior Court, County of Los  
19 Angeles, Honorable Judge Ann I. Jones presiding; *Ong v. Howard's Appliances, Inc.*, Case No. 30-  
20 2017-00964213-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge William  
21 Claster presiding; *Hanke v. C&W Facility Services, Inc.*, Case No. CIVDS1814412, California Superior  
22 Court, County of San Bernardino, Honorable Judge David Cohn presiding; *Molina v. Mader News, Inc.*,  
23 Case No. BC685960, California Superior Court, County of Los Angeles, Honorable Judge Yvette M.  
24 Palazuelos presiding; *Alvarez v. Salamander Fire Protection, Inc.*, Case No. BC688326, California  
25 Superior Court, County of Los Angeles, Honorable Judge William F. Highberger presiding; *Rodriguez*  
26 *v. H.F. Cox, Inc.*, Case No. BC653164, California Superior Court, County of Los Angeles, Honorable  
27 Judge Carolyn B. Kuhl presiding; *Fregoso v. Amerigas Propane, Inc.*, Case No. BC697973, California  
28 Superior Court, County of Los Angeles, Honorable Judge Rafael A. Ongkeko presiding; *Teran v.*

1 *Western Plastics, Inc.*, Case No. RIC1722619, California Superior Court, County of Riverside,  
2 Honorable Judge Sunshine Sykes presiding; *Villegas de Torres v. El Monte Superstore Inc.*, Case No.  
3 BC688477, California Superior Court, County of Los Angeles, Honorable Judge Daniel J. Buckley  
4 presiding; *Huynh v. Polypeptide Laboratories, Inc.*, Case No. BC680872, California Superior Court,  
5 County of Los Angeles, Honorable Judge Rafael A. Ongkeko presiding; *Coffee and Cabral v. Flyers*  
6 *Transportation, LLC.*, Case No. 34-2017-00222084, California Superior Court, County of Sacramento,  
7 Honorable Judge Alan G. Perkins presiding; *Guzman v. Century Blinds, Inc.*, Case No. RIC1723654,  
8 California Superior Court, County of Riverside, Honorable Judge Sunshine Sykes presiding; and *Acuna*  
9 *v. Canton Food Co., Inc.*, Case No. BC685001, California Superior Court, County of Los Angeles,  
10 Honorable Judge David S. Cunningham presiding.

11 9. As co-lead counsel for Plaintiff and the proposed Settlement Class, I have been  
12 intimately involved in every aspect of this case from its inception through the present, and I believe  
13 that the proposed Settlement is a favorable result for the Settlement Class Members under the  
14 circumstances presented.

15 10. The details of the work completed in this case by me, my firm and/or my co-counsel  
16 are set forth in the declaration of Elizabeth Nguyen filed concurrently herewith.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
18 true and correct. Executed on January 21, 2022, at El Segundo, California.

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21 Scott M. Lidman  
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