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Attorneys for Plaintiff  
MY LE PHAM

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF ORANGE**

MY LE PHAM, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

PLASMA RUGGEDIZED SOLUTIONS,  
INC., a Delaware corporation; and DOES 1  
through 100,

Defendants.

Case No. 30-2019-01086573-CU-OE-CXC

[Assigned to Hon. Peter Wilson, Dept. CX102]

**DECLARATION OF MILAN MOORE IN  
SUPPORT OF MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT, CLASS  
REPRESENTATIVE'S ENHANCEMENT  
PAYMENT, AND ATTORNEYS' FEES AND  
COSTS**

Date: December 3, 2020  
Time: 2:00 p.m.  
Dept.: CX 102

Date Action Filed: July 30, 2019  
Trial Date: None Set

1 I, MILAN MOORE, declare as follows:

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

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

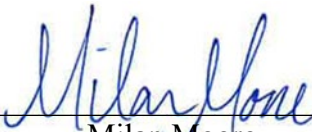
17 3. Since June 11, 2018, I have worked as an associate at my current firm, Lidman Law, APC.  
18 I am currently staffed on approximately seventy (70) active wage and hour class action lawsuits in both  
19 state and federal court.

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

1 presiding; *Villegas de Torres v. El Monte Superstore Inc.*, Case No. BC688477, California Superior  
2 Court, County of Los Angeles, Honorable Judge Daniel J. Buckley presiding; *Guzman v. Century Blinds*,  
3 Case No. RIC1723654, California Superior Court, County of Riverside, Honorable Judge Sunshine S.  
4 Sykes presiding; *George v. Convergence Marketing*, Case No. CIVDS1901039, California Superior  
5 Court, County of San Bernardino, Honorable Judge David S. Cohn presiding; *Romero v. Fillmore*  
6 *Hospitality, LLC*, Case No. BC705667, California Superior Court, County of Los Angeles, Honorable  
7 Judge Maren E. Nelson presiding; *Davis v. WeDriveU*, Case No. 18CV322578, California Superior  
8 Court, County of Santa Clara, Honorable Judge Brian C. Walsh presiding; and *Acuna v. Canton Food*  
9 *Co., Inc.*, Case No. BC685001, California Superior Court, County of Los Angeles, Honorable Judge  
10 David S. Cunningham presiding.

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

15 I declare under penalty of perjury under the laws of the State of California and the United States  
16 that the foregoing is true and correct. Executed on November 6, 2020, at El Segundo, California.

17  
18   
19 Milan Moore