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Attorneys for Plaintiff
JAIME CAZARES VARGAS

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

JAIME CAZARES VARGAS, as an individual
and on behalf of others similarly situated,

Plaintiff,

vs.

JTS MODULAR, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. BCV-20-100645-JEB

[Assigned to Hon. J. Eric Bradshaw Department: J]

**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**

Date: April 26, 2022
Time: 8:30 a.m.
Dept.: J

Complaint Filed: March 4, 2020
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 Jaime Cazares
3 Vargas ("Plaintiff") in the above-captioned matter. I am a member in good standing of the bar of the
4 State of California and am admitted to practice in this Court. I have personal knowledge of the facts
5 stated in this 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
7 Bar 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,
17 APC. I am currently staffed on approximately seventy (70) active wage and hour class action lawsuits
18 in both 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,*
23 *Inc.*, Case No. BC688326, California Superior Court, County of Los Angeles, Honorable Judge
24 William F. Highberger presiding; *Fregoso v. Amerigas Propane, Inc.*, Case No. BC697973, California
25 Superior Court, County of Los Angeles, Honorable Rafael A. Ongkeko presiding; *Teran v. Western*
26 *Plastics, Inc.*, Case No. RIC1722619, California Superior Court, County of Riverside, Honorable Judge
27 Sunshine Sykes presiding; *Villegas de Torres v. El Monte Superstore Inc.*, Case No. BC688477,

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

12 5. The declaration of my colleague, Scott M. Lidman 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 that the foregoing is
16 true and correct. Executed on March 23, 2022, at El Segundo, California.

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20 Milan Moore