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

JOSE LUIS TOPETE PEREZ, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

PRODUCTION RESOURCE GROUP LLC, a
Delaware limited liability company; and DOES 1
through 100, inclusive,
Defendants.

Case No.: 20STCV38584 *related to* Case No.
20STCV27311

*[Assigned for All Purposes to Hon. Maren E.
Nelson, SSC-17]*

**DECLARATION OF ELIZABETH NGUYEN
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, CLASS
REPRESENTATIVE'S SERVICE AWARD,
AND ATTORNEYS' FEES AND COSTS**

Date: August 19, 2022
Time: 9:00 a.m.
Dept.: SSC-17

Complaint Filed: October 7, 2020
Trial Date: None Set

1 I, ELIZABETH NGUYEN, declare as follows:

2 1. I am a shareholder of the law firm Lidman Law, APC, and counsel for the named
3 Plaintiff Jose Luis Topete Perez (“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
5 practice in this Court. I have personal knowledge of the facts stated in this declaration and could
6 testify competently to them if called upon to do so.

7 2. I am a 2005 graduate of Loyola Law School. During law school, I worked as an extern
8 for the Honorable Erithe A. Smith, U.S. Bankruptcy Court for the Central District of California.
9 During law school, I also worked as a law clerk in the Enforcement Unit of the Office of the Chief
10 Trial Counsel for the State Bar of California.

11 3. Since graduating from law school, my practice has focused almost exclusively on
12 employment litigation. In October 2007, I began working as an associate attorney at the international
13 law firm of Littler Mendelson P.C., at its Los Angeles office, which according to its website is the
14 “largest law firm in the world exclusively devoted to representing management in employment,
15 employee benefits and labor law matters.”

16 4. In June 2012, I left Littler Mendelson to work at the Los Angeles office of Reed Smith
17 LLP. During my employment at Reed Smith, I worked exclusively in the labor and employment
18 practice group. In June 2013, I returned to Littler Mendelson as an associate attorney, was promoted
19 to Shareholder in 2015, and was elevated to participating Shareholder in 2017. Since October 2007,
20 my practice has been and continues to be exclusively labor and employment law, with a strong
21 emphasis on wage and hour class actions venued in both state and federal courts. During this time
22 period and my legal career in general, I also worked on a number of single and multi-plaintiff wage
23 and hour matters as well. During my employment at Littler Mendelson, I was a member of its Class
24 Action Practice Group.

25 5. During my employment at Littler Mendelson, I played a significant role in the class
26 actions that I was staffed on, and was primarily responsible for managing the litigation both in my role
27 as a Senior Associate and as a Shareholder. In particular, I received a wide-array of wage and hour
28

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

14 6. Although not exhaustive, below is a list of many of the wage and hour class and PAGA
15 actions that I performed substantial work on while I was an Associate and/or Shareholder at Littler
16 Mendelson:

- 17 ► *Branch v. PM Realty Group, Inc.* Case No. BC575759, Los Angeles Superior
18 Court, County of Los Angeles, Honorable Ann Jones, presiding.
- 19 ► *Herrera v. Pharmavite, LLC*, Case No. BC599201, Los Angeles Superior
20 Court, County of Los Angeles, Honorable Judge Carolyn Kuhl, presiding.
- 21 ► *Dugan v. Stoneledge Furniture, LLC*, Case No. 16-cv-01125-PA-FFMx, United
22 States District Court, Central District of California, Honorable Judge Percy
23 Anderson, presiding.
- 24 ► *Klune v. Stoneledge Furniture, LLC*, Case No. 14-cv-03986-PA-FFMx, United
25 States District Court, Central District of California, Honorable Judge Percy
26 Anderson, presiding.

- 1 ▶ *Diaz v. ABM Industries, Inc.; Ampco Parking*, Case No. BC362932, California
2 Superior Court, County of Los Angeles, Honorable Judge Jane Johnson,
3 presiding.¹
- 4 ▶ *Adams v. Luxottica Retail North America, Inc.*, Case No. 07CC01346,
5 California Superior Court, County of Orange, Honorable Judge Thierry Patrick
6 Colaw, presiding.
- 7 ▶ *Page v. Luxottica Retail North America, Inc.*, Case No. FCS041512, California
8 Superior Court, County of Solano, Honorable Judge Paul Berman, presiding.
- 9 ▶ *Parker v. FedEx National LTL, Inc.*, Case No. 11-CV-006380-DSF-FFM,
10 United States District Court, Central District of California, Honorable Judge
11 Dale Fischer, presiding.
- 12 ▶ *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United
13 States District Court, Central District of California, Honorable Judge Margaret
14 Morrow, presiding.
- 15 ▶ *Bernal v. Comerica Bank, et al.*, Case No. 11-cv-01298-JAH-BGS, United
16 States District Court, Central District of California, Honorable Judge Margaret
17 Morrow, presiding.
- 18 ▶ *Granata v. Comerica Bank, et al.*, Case No. 37-2011-00086316-CU-OE-CTL,
19 California Superior Court, County of San Diego, Honorable Judge Jeffrey B.
20 Barton, 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 Judge Terry Green, presiding.
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28 ¹ This matter was consolidated and litigated collectively with Case Nos. BC380923, BC 381523 and BC 406663.

- 1 ▶ *Rumohr v. Comerica Bank, et al.*, Case No. CGC-11-508433, California
2 Superior Court, County of San Francisco.
- 3 ▶ *Robertson v. FedEx National LTL, Inc.*, Case No. 09-CV-05016-DSF-FFM,
4 United States District Court, Central District of California, Honorable Judge
5 Dale Fischer, presiding.
- 6 ▶ *Wittman v. FedEx National LTL, Inc.*, Case No. 09-CV-03663-DSF-FFM,
7 United States District Court, Central District of California, Honorable Judge
8 Dale Fischer, presiding.

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

25 8. I have been appointed Class Counsel in: *Guardado v. Wesley Allen, Inc.*, Case No.
26 BC683027, California Superior Court, County of Los Angeles, Honorable Judge Carolyn B. Kuhl
27 presiding; *Rodriguez v. Satco, Inc.*, Case No. BC682137, California Superior Court, County of Los
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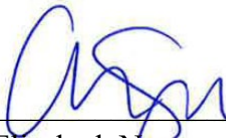
Angeles, Honorable Judge Ann I. Jones presiding; *Ong v. Howard's Appliances, Inc.*, Case No. 30-2017-00964213-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge William Claster presiding; *Hanke v. C&W Facility Services, Inc.*, Case No. CIVDS1814412, California Superior Court, County of San Bernardino, Honorable Judge David Cohn presiding; *Molina v. Mader News, Inc.*, Case No. BC685960, California Superior Court, County of Los Angeles, Honorable Judge Yvette M. Palazuelos presiding; *Alvarez v. Salamander Fire Protection, Inc.*, Case No. BC688326, California Superior Court, County of Los Angeles, Honorable Judge William F. Highberger presiding; *Rodriguez v. H.F. Cox, Inc.*, Case No. BC653164, California Superior Court, County of Los Angeles, Honorable Judge Carolyn B. Kuhl presiding; *Fregoso v. Amerigas Propane, Inc.*, Case No. BC697973, California Superior Court, County of Los Angeles, Honorable Judge Rafael A. Ongkeko presiding; *Teran v. Western Plastics, Inc.*, Case No. RIC1722619, California Superior Court, County of Riverside, Honorable Judge Sunshine Sykes presiding; *Villegas de Torres v. El Monte Superstore Inc.*, Case No. BC688477, California Superior Court, County of Los Angeles, Honorable Judge Daniel J. Buckley presiding; *Huynh v. Polypeptide Laboratories, Inc.*, Case No. BC680872, California Superior Court, County of Los Angeles, Honorable Judge Rafael A. Ongkeko presiding; *Guzman v. Century Blinds*, Case No. RIC1723654, California Superior Court, County of Riverside, Honorable Judge Sunshine S. Sykes presiding; *George v. Convergence Marketing*, Case No. CIVDS1901039, California Superior Court, County of San Bernardino, Honorable Judge David S. Cohn presiding; *Coffee, et al. v. Flyers Transportation Energy, LLC*, Case No. 34-2017-00222084, California Superior Court, County of Sacramento, Honorable Judge Alan G. Perkins presiding; *Romero v. Fillmore Hospitality, LLC*, Case No. BC705667, California Superior Court, County of Los Angeles, Honorable Judge Maren E. Nelson presiding; *Wennerstrom, et al. v. Giant Inland Empire R.V. Center*, Case No. CIVDS1617291, California Superior Court, County of San Bernardino, Honorable Judge David S. Cohn presiding; *Contreras, et al. v. Letter Ride, LLC*, Case No. 37-2018-00020841-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Judge Eddie C. Sturgeon presiding; *Davis v. WeDriveU*, Case No. 18CV322578, California Superior Court, County of Santa Clara, Honorable Judge Brian C. Walsh presiding; *Acuna v. Canton Food Co., Inc.*, Case No.

1 BC685001, California Superior Court, County of Los Angeles, Honorable Judge David S.
2 Cunningham presiding; and *Contreras v. Worldwide Flight Services, Inc.*, Case No. 2:18-cv-06036-
3 PSG-SS, United States District Court for the Central District of California, the Honorable Judge Philip
4 S. Gutierrez presiding.

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

8 10. The details of the work completed in this case by me, my firm and/or my co-counsel
9 are set forth in the declaration of Scott M. Lidman filed concurrently herewith.

10 I declare under penalty of perjury under the laws of the State of California that the foregoing is
11 true and correct. Executed on July 26, 2022, at El Segundo, California.

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Elizabeth Nguyen