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Attorneys for Plaintiff

SADAMATSU VICENTE GONZALEZ,

Successor-In-Interest to Plaintiff Vicente Gonzalez

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

VICENTE GONZALEZ, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

NORCO PLASTICS, INC., a California
corporation; BEYOND STAFFING
SOLUTIONS, INC., a California corporation;
MOONSTONE PEO, INC., a Texas
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. CIVSB2026519

*[Assigned for all purposes to the Hon. David Cohn,
Dept. S-26]*

**DECLARATION OF MILAN MOORE IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: June 22, 2023

Time: 10:00 a.m.

Dept.: S-26

Action Filed: August 7, 2020

Trial Date: None

1 I, MILAN MOORE, declare as follows:

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

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

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

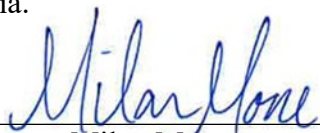
21 4. I have been appointed Class Counsel in *Hanke v. C&W Facility Services, Inc.*, Case No.
22 CIVDS1814412, California Superior Court, County of San Bernardino, Honorable Judge David Cohn
23 presiding; *Molina v. Mader News, Inc.*, Case No. BC685960, California Superior Court, County of Los
24 Angeles,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

1 presiding; *Villegas de Torres v. El Monte Superstore Inc.*, Case No. BC688477, California Superior Court,
2 County of Los Angeles, Honorable Judge Daniel J. Buckley presiding; *Guzman v. Century Blinds*, Case
3 No. RIC1723654, California Superior Court, County of Riverside, Honorable Judge Sunshine S. Sykes
4 presiding; *George v. Convergence Marketing*, Case No. CIVDS1901039, California Superior Court,
5 County of San Bernardino, Honorable Judge David S. Cohn presiding; *Romero v. Fillmore Hospitality,*
6 *LLC*, Case No. BC705667, California Superior Court, County of Los Angeles, Honorable Judge Maren E.
7 Nelson presiding; *Davis v. WeDriveU*, Case No. 18CV322578, California Superior Court, County of
8 Santa Clara, Honorable Judge Brian C. Walsh presiding; *Acuna v. Canton Food Co., Inc.*, Case No.
9 BC685001, California Superior Court, County of Los Angeles, Honorable Judge David S. Cunningham
10 presiding; and *Contreras v. Worldwide Flight Services, Inc.*, Case No. 2:18-cv-06036-PSG-SS, United
11 States District Court for the Central District of California, the Honorable Judge Philip S. Gutierrez
12 presiding.

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

16 I declare under penalty of perjury under the laws of the State of California that the foregoing is
17 true and correct.

18 Executed on May 8, 2023 at El Segundo, California.

19
20 
21 Milan Moore