

LIDMAN LAW, APC
Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Elizabeth Nguyen (SBN 238571)
enguyen@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
RAUL NUNEZ

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff
RAUL NUNEZ

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

RAUL NUNEZ, as an individual and on behalf of
all others similarly situated,

Plaintiff,

vs.

TK SERVICES, INC., a California corporation;
and DOES 1 through 100,

Defendants.

Case No. BC682512

*[Assigned for All Purposes to Hon. Kenneth
R. Freeman, SSC-14]*

**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: July 19, 2022
Time: 11:30 a.m.
Dept.: SSC-14

Complaint Filed: November 6, 2017
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
3 the named Plaintiff Raul Nunez (“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 1998 graduate of Santa Clara University School of Law, where I graduated
8 *summa cum laude*. During law school, I worked as a summer associate for the international
9 employment law 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
12 of Littler Mendelson P.C., at its Los Angeles office, which according to its website is the largest law
13 firm in the world exclusively devoted to representing management in employment, employee benefits
14 and 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
18 work at the law firm of Loeb & Loeb, again working exclusively in the Labor & Employment
19 department. In 2008, I returned to Littler Mendelson, was promoted to Shareholder in 2009, and from
20 2008 until the end of 2017, I practiced exclusively labor and employment law, with a strong emphasis
21 and most of my time working on wage and hour class actions venued in both state and federal courts.
22 During that time and my legal career in general, I also worked on a number of single and multi-plaintiff
23 wage and hour 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.
26 In particular, I received a wide-array of wage and hour class action experience performing the
27 following types of tasks: drafting demurrers, motions to strike and/or dismiss; removing actions from
28

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

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

- 15 ► *Ortega v. J.B. Hunt Transport, Inc.*, Case No. 07-cv-8336-RGK-AFMx, United
16 States District Court, Central District of California, Honorable Gary Klausner,
17 presiding¹.
- 18 ► *Aceves v. J.B. Hunt Transport, Inc.*, Case No. CIVDS1306133, California
19 Superior Court, County of San Bernardino, Honorable Michael Sachs, presiding.
- 20 ► *Moreno v. J.B. Hunt Transport, Inc.*, Case No. BC388612, California Superior
21 Court, County of Los Angeles, Honorable Mel Red Recana, presiding.
- 22 ► *Newcomb v. J.B. Hunt Transport, Inc.*, Case No. RG16815734, California
23 Superior Court, County of Alameda, Honorable Winifred Smith, presiding.

24
25
26
27 ¹ My work on this matter including proceedings not only in District Court, but also work before the
28 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. 12-cv-08590-PA-MAN,
2 United States District Court, Central District of California, Honorable Percy
3 Anderson, presiding.
- 4 ▶ *Vaquero v. Stoneledge Furniture, LLC, et al.*, Case No. BC388612, California
5 Superior Court, County of Los Angeles, Honorable Elihu Berle, presiding.²
- 6 ▶ *Dugan v. Stoneledge Furniture, LLC*, Case No. 16-cv-01125-PA-FFMx, United
7 States District Court, Central District of California, Honorable Percy Anderson,
8 presiding.
- 9 ▶ *Klune v. Stoneledge Furniture, LLC*, Case No. 14-cv-03986-PA-FFMx, United
10 States District Court, Central District of California, Honorable Percy Anderson,
11 presiding.
- 12 ▶ *Diaz v. ABM Industries, Inc.; Ampco Parking*, Case No. BC362932, California
13 Superior Court, County of Los Angeles, Honorable Jane Johnson, presiding.³
- 14 ▶ *Adams v. Luxottica Retail North America, Inc.*, Case No. 07CC01346, California
15 Superior Court, County of Orange, Honorable Thierry Patrick Colaw, presiding.
- 16 ▶ *Sakkab v. Luxottica Retail North America, Inc.*, Case No. 12-cv-00436-GPC-
17 KSC, United States District Court, Southern District of California.⁴
- 18 ▶ *Page v. Oakley, Inc.*, Case No. FCS041512, California Superior Court, County
19 of Solano, Honorable Paul Berman, presiding.
- 20 ▶ *Ramirez v. Oakley, Inc.*, Case No. 30-2014-00731617-CU-OE-CJC California
21 Superior Court, County of Orange, Honorable William Claster, presiding.

23 ² My work on this matter included proceedings not only in the trial court, but also before the
24 California Courts of Appeal and the California Supreme Court.

25 ³ This matter was consolidated and litigated collectively with Case Nos. BC380923, BC 381523 and
26 BC 406663.

27 ⁴ The work I performed on this case included work in the United States Court of Appeals for the Ninth
28 Circuit.

- ▶ *Ramirez v. Oakley, Inc.*, Case No. 30-2014-00723846-CU-DE-CXC, California Superior Court, County of Orange, Honorable William Claster, presiding.
- ▶ *Sierra v. Oakley, Inc.*, Case No. 13-cv-00319-AG-JPR, United States District Court, Central District of California, Honorable Andrew Guilford, presiding.⁵
- ▶ *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United States District Court, Central District of California, Honorable Margaret Morrow, presiding.
- ▶ *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United States District Court, Central District of California, Honorable Margaret Morrow, presiding.
- ▶ *Khelghatian v. Comerica Bank, et al.*, Case No. 11-cv-7689-DSF-FFMx, United States District Court, Southern District of California, Honorable John A. Houston, presiding.
- ▶ *Babasa v. Comerica Bank, et al.*, Case No. 11-cv-0595-JAH-BGS, United States District Court, Central District of California, Honorable Margaret Morrow, presiding.
- ▶ *Bernal v. Comerica Bank, et al.*, Case No. 11-cv-01298-JAH-BGS, United States District Court, Central District of California, Honorable Margaret Morrow, presiding.
- ▶ *Khalili v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United States District Court, Northern District of California.
- ▶ *Granata v. Comerica Bank, et al.*, Case No. 37-2011-00086316-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Jeffrey B. Barton, presiding.

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

- 1 ▶ *Mathews v. Comerica Bank, et al.*, Case No. 111CV194781, California Superior
- 2 Court, County of Santa Clara.
- 3 ▶ *Gallegos v. Comerica Bank, et al.*, Case No. BC455515, California Superior
- 4 Court, County of Los Angeles, Honorable Terry Green, presiding.
- 5 ▶ *Rumohr v. Comerica Bank, et al.*, Case No. CGC-11-508433, California Superior
- 6 Court, County of San Francisco.
- 7 ▶ *Smith v. Werner Enterprises*, Case No. 15-cv-02978-RS, United States District
- 8 Court, Northern District of California, Honorable Richard Seeborg, presiding.

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

24 8. I have been appointed Class Counsel in: *Guardado v. Wesley Allen, Inc.*, Case No.
25 BC683027, California Superior Court, County of Los Angeles, Honorable Judge Carolyn B. Kuhl
26 presiding; *Rodriguez v. Satco, Inc.*, Case No. BC682137, California Superior Court, County of Los
27 Angeles, Honorable Judge Ann I. Jones presiding; *Ong v. Howard's Appliances, Inc.*, Case No. 30-
28

1 2017-00964213-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge
2 William Claster presiding; *Hanke v. C&W Facility Services, Inc.*, Case No. CIVDS1814412,
3 California Superior Court, County of San Bernardino, Honorable Judge David Cohn presiding; *Molina*
4 *v. Mader News, Inc.*, Case No. BC685960, California Superior Court, County of Los Angeles,
5 Honorable Judge Yvette M. Palazuelos presiding; *Alvarez v. Salamander Fire Protection, Inc.*, Case
6 No. BC688326, California Superior Court, County of Los Angeles, Honorable Judge William F.
7 Highberger presiding; *Rodriguez v. H.F. Cox, Inc.*, Case No. BC653164, California Superior Court,
8 County of Los Angeles, Honorable Judge Carolyn B. Kuhl presiding; *Fregoso v. Amerigas Propane,*
9 *Inc.*, Case No. BC697973, California Superior Court, County of Los Angeles, Honorable Judge Rafael
10 A. Ongkeko presiding; *Teran v. Western Plastics, Inc.*, Case No. RIC1722619, California Superior
11 Court, County of Riverside, Honorable Judge Sunshine Sykes presiding; *Villegas de Torres v. El*
12 *Monte Superstore Inc.*, Case No. BC688477, California Superior Court, County of Los Angeles,
13 Honorable Judge Daniel J. Buckley presiding; *Huynh v. Polypeptide Laboratories, Inc.*, Case No.
14 BC680872, California Superior Court, County of Los Angeles, Honorable Judge Rafael A. Ongkeko
15 presiding; *Guzman v. Century Blinds*, Case No. RIC1723654, California Superior Court, County of
16 Riverside, Honorable Judge Sunshine S. Sykes presiding; *George v. Convergence Marketing*, Case
17 No. CIVDS1901039, California Superior Court, County of San Bernardino, Honorable Judge David S.
18 Cohn presiding; *Coffee, et al. v. Flyers Transportation Energy, LLC*, Case No. 34-2017-00222084,
19 California Superior Court, County of Sacramento, Honorable Judge Alan G. Perkins presiding; *Romero*
20 *v. Fillmore Hospitality, LLC*, Case No. BC705667, California Superior Court, County of Los Angeles,
21 Honorable Judge Maren E. Nelson presiding; *Wennerstrom, et al. v. Giant Inland Empire R.V. Center*,
22 Case No. CIVDS1617291, California Superior Court, County of San Bernardino, Honorable Judge
23 David S. Cohn presiding; *Contreras, et al. v. Letter Ride, LLC*, Case No. 37-2018-00020841-CU-OE-
24 CTL, California Superior Court, County of San Diego, Honorable Judge Eddie C. Sturgeon presiding;
25 *Davis v. WeDriveU*, Case No. 18CV322578, California Superior Court, County of Santa Clara,
26 Honorable Judge Brian C. Walsh presiding; *Acuna v. Canton Food Co., Inc.*, Case No. BC685001,
27 California Superior Court, County of Los Angeles, Honorable Judge David S. Cunningham presiding;
28

1 and *Contreras v. Worldwide Flight Services, Inc.*, Case No. 2:18-cv-06036-PSG-SS, United States
2 District Court for the Central District of California, the Honorable Judge Philip S. Gutierrez presiding.

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

6 10. On November 6, 2017, Plaintiff filed a putative class action complaint against TK
7 Services in Los Angeles County Superior Court. Pursuant to the Court's approval and to effectuate
8 the terms of the settlement, on June 15, 2021, Plaintiff filed a First Amended Class and Representative
9 Action Complaint. In the FAC, Plaintiff alleges that TK Services: 1) failed to pay all overtime wages
10 owed; (2) failed to pay all minimum wages owed; (3) failed to pay all wages at the agreed-upon rate;
11 (4) failed to provide all legally required meal periods; (5) failed to pay all final wages upon separation
12 of employment; (6) engaged in unlawful business practices; (7) failure to authorize and permit all
13 legally required rest periods; (8) failure to provide accurate, itemized wage statements and (9) liability
14 for civil penalties under the Labor Code Private Attorneys General Act of 2004 ("PAGA").

15 11. As explained in detail in the Motion for Preliminary Approval, Plaintiff's primary
16 theories of liability are related to TK Services' alleged unlawful wage and timekeeping and meal and
17 rest period policies and practices. Specifically, Plaintiff alleges that he and Settlement Class members
18 were not fully compensated for all of their time worked. Plaintiff alleges TK Services would keep
19 track of his hours and the hours of the other non-exempt employees, and would unlawfully shave their
20 work time and/or round their work time such that they would not be fully paid for all time worked.
21 Plaintiff also alleges that this time shaving and/or rounding practice utilized by TK Services was not-
22 even handed over time and would almost exclusively round and shave in TK Services' favor such that
23 the employees were routinely underpaid for their time worked.

24 12. TK Services contends that it compensated Settlement Class members for all of their
25 time worked. TK Services also contends that its rounding practices were lawful, and any unpaid time
26 was *de minimis* and therefore non-compensable. TK Services further asserts that Plaintiff would be
27
28

1 unable to certify a rounding class given the individualized inquiries that would be required, and also
2 that TK Services' rounding mechanism was, according to it, allegedly facially neutral.

3 13. Plaintiff alleges that TK Services failed to include the payment of annual bonuses to
4 Plaintiff and Settlement Class members in the regular rate of pay when overtime was paid, resulting
5 in a systematic underpayment of overtime wages. Plaintiff alleges that this resulted in a systematic
6 underpayment of overtime wages.

7 14. TK Services contends that Settlement Class members received all overtime wages to
8 which they were entitled. TK Services further counters that any bonuses to putative class members
9 during the relevant time period were discretionary and did not need to be included in the regular rate
10 of pay for overtime purposes.

11 15. Plaintiff alleges that he and Settlement Class members were not provided with all
12 legally-compliant first meal periods beginning before the end of the fifth hour of work. Specifically,
13 Plaintiff alleges that up to December 1, 2017, TK Services did not record meal periods and would
14 unlawfully deduct thirty (30) minutes of work time for purported meal periods whether they were
15 taken or not, and whether they were less than 30 minutes or not. Further, once TK Services began
16 keeping track of meal periods, the records showed that in approximately 47% of the meal-enabling
17 shifts, there was either a late, short, or missed meal period.

18 16. TK Services counters that it has always provided non-exempt employees with an
19 opportunity to take legally compliant meal periods, and any non-compliant meal periods reflected in
20 employee timekeeping records were solely the result of employee choice, rather than any policy or
21 practice of TK Services. TK Services points out that it is only required to "provide" the opportunity
22 to take meal periods, not "ensure" meal periods are taken, and that they have always done so. Finally,
23 TK Services contends Plaintiff's meal period claim is not suited for class certification, since individual
24 inquiries would be required to assess which employees took non-compliant meal periods, how many
25 meal periods were non-compliant or missed, and the reasons why a particular employee took a non-
26 compliant meal period or missed a meal period during a particular shift.

1 17. Plaintiff alleges that he and Settlement Class members were also not authorized and
2 permitted to take all required rest periods due to TK Services' rest period policies and practices that
3 fail to authorize and permit all rest periods for every four hours worked, *or major fraction thereof*.
4 Specifically, Plaintiff alleges that TK Services' rest period policy as written in its Employee Handbook
5 required non-exempt employees to remain on the work premises during rest periods. By prohibiting
6 its non-exempt employees from leaving the work premises during rest periods, Plaintiff alleges TK
7 Services fails to relinquish control in violation of California law and resulted in at least one rest period
8 violation on every shift in excess of 3.5 hours.

9 18. TK Services contends it has always maintained and enforced lawful rest period policies
10 and practices, and that Settlement Class Members were authorized and permitted to take all off-duty
11 rest periods in compliance with California law. TK Services also contends that Plaintiff did not allege
12 a rest period claim in his operative complaint. Further, TK Services argues that Plaintiff's rest period
13 claim is inherently unsuited for class treatment as it requires an individualized inquiry into whether
14 each Settlement Class Member was in fact authorized and permitted to take a compliant rest period,
15 which would devolve into an unmanageable series of mini-trials.

16 19. Plaintiff further allege that TK Services issued inaccurate wage statements in violation
17 of Labor Code § 226 as a result of the alleged unpaid wages and unpaid meal and rest period premium
18 wages described above.

19 20. TK Services argues that meal and rest period claims cannot support a claim for wage
20 statement penalties. TK Services further argues that its alleged wage statement violations could not
21 be shown to be "knowing and intentional," and that Plaintiff cannot show that he or any other employee
22 "suffer[ed] injury" as a result of the alleged wage statement violations, as required by Lab. Code §
23 226(e) for imposition of penalties. .

24 21. Plaintiff alleges that TK Services is also liable for waiting time penalties under Labor
25 Code § 203 as a result of its failure to pay all minimum and overtime wages and meal and rest period
26 premium wages.

27 22. TK Services asserts it has strong defenses to the waiting time claim because there exist
28 good-faith disputes as to Plaintiff's underlying claims, precluding imposition of penalties.

1 23. Plaintiff also seeks civil penalties under the PAGA as a result of the foregoing alleged
2 Labor Code violations.

3 24. Since Plaintiff's PAGA claim is a derivative claim based on the underlying claims, TK
4 Services asserts the PAGA claim would fail with those claims. TK Services also maintains that given
5 its good faith defenses, this Court would exercise its discretion to substantially reduce any PAGA
6 penalties if it were to find TK Services liable for any of Plaintiff's claims.

7 25. These considerations not only bore heavily on the negotiations leading to the
8 Settlement, but also confirm that the Settlement is fair, adequate, and reasonable compromise in view
9 of the risks of further litigation. As detailed in Plaintiff's Motion for Preliminary Approval, Plaintiff
10 carefully vetted the claims at issue and conducted a detailed statistical analysis of class-wide data to
11 arrive at the calculated damages figures. Thus, while these risks are far from exhaustive, they
12 demonstrate that the Settlement is fair, adequate, and reasonable in view of them.

13 26. Throughout the three-year litigation of this action, Plaintiff propounded two sets of
14 written discovery, including without limitation, Special Interrogatories, Form Interrogatories General
15 and Employment, and Requests for Production. TK Services responded to the first set of written
16 discovery and produced nearly 20,000 pages of documents and information pertaining to Plaintiff and
17 the putative class. Further, the Parties completed the *Belaire-West* notice process and TK Services
18 produced the contact information for the putative class members that did not opt-out. Additionally,
19 over the course of two days, Plaintiff took the deposition of TK Services' Person Most Knowledgeable.
20 After agreeing to participate in private mediation, TK Services informally produced a class list, as well
21 as its wage and hour policies and other relevant documents and information relevant to the claims
22 alleged that had not already been produced or obtained through formal discovery methods. After the
23 detailed review of the payroll and time records for the putative class and other documents and policies
24 produced by TK Services, Class Counsel drew on their extensive experience in similar cases to assess
25 the strengths and weaknesses of Plaintiff's case. This discovery allowed the parties to assess the merits
26 and value of Plaintiff's claims and TK Services' defenses thereto, if a settlement could not be reached.

1 27. On October 6, 2020, after extensive research and analysis, a full-day mediation was
2 held with Jeffrey Krivis, a well-respected wage and hour class action mediator. During mediation, the
3 parties vigorously debated their opposing legal positions, the likelihood of certification of Plaintiff's
4 claims, and the legal basis for the claims and defenses. Ultimately, the parties agreed in principle on
5 a class-wide resolution. In the weeks that followed, the parties finalized the terms of settlement and
6 executed the Stipulation of Settlement ("Settlement").

7 28. Plaintiff submitted the Settlement to the Court with his Motion for Preliminary Approval
8 on March 10, 2021. On April 12, 2021, Plaintiff submitted a supplemental brief and revised settlement
9 agreement in accordance with the Los Angeles Superior Court's Checklist for Preliminary Approval of
10 Class Action Settlements. On June 22, 2021, the Court granted preliminary approval. Attached hereto
11 as **Exhibit A** is a true and correct copy of the June 22, 2021 Order Granting Preliminary Approval.

12 29. The Settlement Class encompasses all "current and former non-exempt, hourly
13 employees of Defendant TK Services, Inc. who worked for Defendant in California at any time from
14 November 6, 2013 through June 22, 2021."

15 30. Funds remaining unclaimed will be distributed to the California State Controller's
16 Office – Unclaimed Property Fund in the name of the Settlement Class member.

17 31. In my experience in wage and hour class action matters similar to this one, fee awards
18 generally average around one-third of the gross recovery.

19 32. My law firm's and co-counsel's work on this case includes, but is not limited to
20 conducting pre-filing investigation, analyzing Plaintiff's claims, conducting legal research,
21 propounding two sets of written discovery, participating in an informal discovery conference,
22 participating in the *Belaire-West* notice process, taking the deposition of TK Services' designated
23 PMK, reviewing approximately 20,000 pages of TK Services' documents and policies, analyzing
24 Settlement Class members' timekeeping data and payroll records, preparing for and attending
25 mediation, negotiating and revising the long-form Settlement, preparing the Motions for Preliminary
26 and Final Approval, overseeing the settlement administration process, communicating with Settlement
27 Class members, and otherwise litigating this case.

33. Since undertaking representation of Plaintiff, my firm and/or co-counsel's firm dedicated substantial resources to this litigation, including expending a total of \$33,855.76, in actual costs, have devoted substantial time to this litigation and expect to incur approximately \$1,725.00 in future costs for filing the instant motion, filing the final declaration regarding distribution of settlement, continued Case Anywhere fees for six quarters, service and messenger fees, postage fees, and/or LACourtConnect costs for future appearances.⁶ A true and correct copy of my firm's and Haines Law Group's costs summary in this matter is attached hereto as **Exhibit B**.

34. My experience in matters similar to this one was integral in evaluating the strengths and weaknesses of this case and the reasonableness of the Settlement. Practice in the narrow field of wage and hour litigation requires skill and knowledge concerning the rapidly evolving substantive state and federal law, as well as the procedural law of class action litigation. This case involved nuanced legal issues including questions surrounding the potential applicability of the *de minimis* defense and the propriety of statutory penalties, to name just a few, to name just a few.

35. Given the considerable potential for adverse outcomes in this case, including, but not limited to losing on class certification and/or merits issues, the contingent risk borne by Class Counsel was great. In addition to the legal and procedural challenges this lawsuit presented, there were also other practical challenges. There was a real risk that my firm and co-counsel's firm would not be compensated for our work, because our firms handled this matter on a purely contingent basis. Thus, Plaintiffs were not responsible for paying my firm's attorneys' fees and my firm could only recover attorneys' fees if Plaintiffs were successful. By the time I (or someone from my firm) attend the final approval hearing in this matter, my firm and co-counsel firm will have litigated this case for well over two years with no payment, all while bearing the risk of non-payment if Plaintiff was unsuccessful. Moreover, as discussed above, Class Counsel has advanced \$35,580.76 in litigation costs on a contingency basis, which also carried risk because Class Counsel would not recoup its costs in the event Plaintiff did not prevail in this lawsuit.

⁶ This includes total costs incurred by both law firms.

36. In this case, Class Counsel have a lodestar of \$328,360 which results in a multiple of 1.78 compared to the \$583,333.33 fee request. The following is a general summary showing the number of hours of work performed by each attorney and paralegal in my firm and co-counsel's firm on this case:

Name	Rate	Hours	Pre-Multiplier Lodestar
Scott M. Lidman (23rd Year Attorney)	\$750	186.4	\$139,800
Elizabeth Nguyen (16th Year Attorney)	\$650	105.7	\$68,705
Paul K. Haines (15th Year Attorney)	\$650	65.8	\$42,770
Milan Moore (6th Year Attorney)	\$400	179.5	\$71,800
Paralegals	\$175	30.2	\$5,285
Total Lodestar			\$328,360

37. My proposed hourly rate of \$750, Ms. Nguyen's proposed hourly rate of \$650, Mr. Haines' proposed hourly rate of \$650, and Ms. Moore's proposed hourly rate of \$400 are reasonable in light of our respective skills, wage and hour class action litigation experience, reputation, and fee awards to other attorneys of similar experience in California. Moreover, our requested hourly rates are in line with the *Laffey Matrix*, a true and correct copy of which is attached hereto as **Exhibit C**.

38. The attorneys' fee award requested is consistent with those routinely awarded by California superior courts. California superior courts frequently grant common fund awards of 33%. *See, e.g., Ochoa v. Haralambos Beverage Co.*, No. BC319588 (Super. Ct., Los Angeles County, Feb. 1, 2007) (33.3% fee award with no mention of lodestar crosscheck); *Jones v. Alliance Imaging, Inc.*, No. RG05210418 (Super. Ct., Alameda County, Nov. 27, 2006) (33% fee award with no mention of lodestar crosscheck); *Wisniewski v. Pacific Maritime Assoc.*, No. BC293134 (Super. Ct., Los Angeles

County, Nov. 20, 2006) (30.7% fee award from \$12.9 million settlement with no mention of lodestar crosscheck); *Garcia v. Save Mart Supermarkets*, No. 312026 (Super. Ct., Stanislaus County, Aug. 3, 2004) (33% fee award with no mention of lodestar crosscheck); *Terrell v. Ocean's 11 Casino, Inc.*, No. GIC795732 (Super. Ct., San Diego County, Feb. 10, 2004) (approving 33% fee award); *Big Lots Overtime Cases*, JCC Proceeding No. 4283, San Bernardino County Superior Court, Feb 4, 2004) (approving a 33% fee recovery); *Tokar v. GEICO*, (San Diego Superior Court, No. GIC 810166, July 9, 2004) (approving award of 33-1/3%); *Davis v. The Money Store, Inc.*, (San Diego County Superior Court, No. 99AS01716, December 26, 2000) (33-13% of the settlement).

39. Indeed, numerous courts have awarded attorneys' fees of up to, or in excess of 40% of the common fund. *Ammari Electronics, et al. v. Pacific Bell Directory*, Alameda County Sup. Ct., Case No. RG05198014 (awarded 43.8%) (2015); *In re California Indirect Purchaser X Ray Film Antitrust Litigation*, San Francisco Sup. Ct. 1998 (citing *Abzug v. Kerkorian*, Los Angeles Sup. Ct., Nov. 19, 1990, Case No. CA-00981 (45%) and *Haitz v. Meyer*, Alameda County Sup. Ct., August 20, 1990, Case No. 5729683 (45%)); *Hall v. Cinema 7, Inc.*, San Francisco Sup. Ct., July 16, 2008, Case No. CGC-01-409105 (53%); and *Rundberg v. Intrawest Napa Dev. Co.*, Napa County Sup. Ct., January 15, 2014, Case No. 26-56886 (40%).

40. Plaintiff has provided written approval of the split of attorneys' fees in this action: 31% to Lidman Law, APC, 46.5% to Haines Law Group, APC, and 22.5% to Michael Burgis & Associates, P.C. Michael Burgis & Associates, P.C. is the referring attorney. Being a private law practice my firm can only properly litigate a limited number of cases at one time. The professional demands of this case were significant, including a significant number of hours of attorney and paralegal time. This litigation precluded my firm from other employment due to the time and financial commitments required by the case. Indeed, because my firm takes on cases on a purely contingency fee, we are only compensated for our time if we successfully settle a case or prevail at trial. Accordingly, I believe the requested fees are reasonable.

41. The requested service award to Plaintiff for \$7,500.00 is also reasonable given Plaintiff took on significant risks, including the risk that he could be liable for Defendant's costs if this case

1 was unsuccessful Plaintiff provided substantial factual information and documents to Class Counsel,
2 attended multiple meetings with Class Counsel to discuss the claims and theories at issue in the
3 litigation, responded to written discovery requests from TK Service, discussed the case, the merits, the
4 defenses, and the overall fairness of the settlement reached. Further, Plaintiff put his future
5 employment prospects at risk by becoming a named Plaintiff in a representative action since the lawsuit
6 is public record and may become known to prospective employers when evaluating him for
7 employment. Moreover, Plaintiff has agreed to release, in addition to the released claims included
8 within the Settlement, all claims, whether known or unknown, under federal, state, or local law against
9 Defendant and the Released Parties. Plaintiff's release includes unknown claims, and that he is, as a
10 result, waiving all rights and benefits afforded by Section 1542 of the California Civil Code.

11 42. Plaintiff served the proposed Settlement Agreement on the California Labor &
12 Workforce Development Agency ("LWDA") on March 10, 2021. A true and correct copy of the email
13 generated by the LWDA website after Plaintiff submitted the Settlement Agreement to the LWDA is
14 attached hereto as **Exhibit D**.

15 43. Plaintiff served the Order Granting Preliminary Approval of the Settlement Settlement
16 on the LWDA on June 24, 2021. A true and correct copy of the email generated by the LWDA website
17 after Plaintiff submitted the order Granting Preliminary Approval to the LWDA is attached hereto as
18 **Exhibit E**.

19 44. Plaintiff will also provide the LWDA with a copy of the instant motion for final
20 approval and supporting documents after it is filed and will file a supplemental proof of service prior
21 to the final approval hearing.

22 I declare under penalty of perjury under the laws of the State of California and the United
23 States that the foregoing is true and correct.

24 Executed on May 20, 2022, at El Segundo, California.

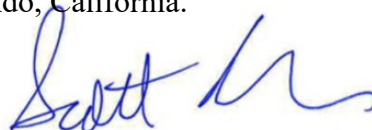
25 
26 _____
27 Scott M. Lidman
28

EXHIBIT A

EXHIBIT A

ORIGINAL

LIDMAN LAW, APC
Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Elizabeth Nguyen (SBN 238571)
enguyen@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
RAUL NUNEZ

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff
RAUL NUNEZ

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

RAUL NUNEZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

TK SERVICES, INC., a California
corporation; and DOES 1 through 100,

Defendants.

Case No. BC682512

FAXED

[Assigned for All Purposes to Hon. Kenneth R.
Freeman, SSC-14]

~~PROPOSED~~ ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT

Date: June 15, 2021
Time: 11:00 a.m.
Dept.: SSC-14

Action Filed: November 6, 2017
Trial Date: None Set

RECEIVED
JUN 15 2021
Filing Window

~~PROPOSED~~ ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

1 The Motion of Plaintiff Raul Nunez ("Plaintiff") for Preliminary Approval of Class Action
2 Settlement will come on regularly for hearing before this Court on June 15, 2021 at 11:00 a.m. The
3 Court, having considered the proposed Stipulation of Settlement (the "Settlement"), attached as Exhibit
4 1 to the Declaration of Scott M. Lidman filed concurrently with the Motion; having considered
5 Plaintiff's Motion for Preliminary Approval of Class Action Settlement, Memorandum of Points and
6 Authorities in support thereof, and supporting declarations filed therewith; and good cause appearing,
7 **HEREBY ORDERS THE FOLLOWING:**

8 1. The Court GRANTS preliminary approval of the class action settlement as set forth in
9 the Settlement and finds its terms to be within the range of reasonableness of a settlement that ultimately
10 could be granted approval by the Court at a Final Fairness Hearing. For purposes of the Settlement,
11 the Court finds that the proposed Settlement Class is ascertainable and that there are a sufficiently well-
12 defined community of interest among the members of the Settlement Class in questions of law and fact.
13 Therefore, for settlement purposes only, the Court grants conditional certification of the following
14 Settlement Class:

15 All current and former non-exempt, hourly employees of Defendant TK
16 Services, Inc. who worked for Defendant in California at any time from
November 6, 2013 through date of preliminary approval.

17 2. The Proposed First Amended Complaint attached to the Settlement as Exhibit A is hereby
18 approved and shall be filed by Plaintiff Raul Nunez within five (5) court days of this Order is signed by
19 the Court.

20 3. For purposes of the Settlement, the Court designates named Plaintiff Raul Nunez as Class
21 Representative, and Scott M. Lidman, Elizabeth Nguyen, and Milan Moore of Lidman Law, APC and
22 Paul Haines of Haines Law Group, APC as Class Counsel.

23 4. The Court designates Phoenix Settlement Administrators as the third-party Settlement
24 Administrator for mailing notices.

25 5. The Court approves, as to form and content, the Notice Packet (which is comprised of the
26 Notice of Pendency of Class Action and Settlement and Notice of Settlement Award) which is attached
27 to the Settlement as Exhibit B.

28 6. The Court finds that the form of notice to the Settlement Class regarding the pendency of

the action and of the Settlement, and the methods of giving notice to members of the Settlement Class, constitutes the best notice practicable under the circumstances, and constitute valid, due, and sufficient notice to all members of the Settlement Class. The form and method of giving notice complies fully with the requirements of California Code of Civil Procedure section 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other applicable law.

7. The Court further approves the procedures for Settlement Class Members to opt out of or object to the Settlement, as set forth in the Class Notice.

8. The procedures and requirements for filing objections in connection with the Final Fairness Hearing are intended to ensure the efficient administration of justice and the orderly presentation of any Settlement Class Member's objection to the Settlement, in accordance with the due process rights of all Settlement Class Members.

9. The Court directs the Settlement Administrator to mail the Notice Packet to the members of the Settlement Class in accordance with the terms of the Settlement.

10. The Class Notice shall provide at least 60 calendar days' notice for members of the Settlement Class to opt out of, or object to, the Settlement.

11. The Final Fairness Hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department SSC-14 of this Court, located at 312 N. Spring Street, Los Angeles, California 90012 on November 4, 2021 at 10:00 a.m.

12. At the Final Fairness Hearing, the Court will consider: (a) whether the Settlement should be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiff's application for reasonable attorneys' fees, reimbursement of litigation expenses, service award to Plaintiff, and payment to the Labor and Workforce Development Agency ("LWDA") for penalties under the Labor Code Private Attorneys General Act ("PAGA") should be granted.

13. Counsel for the parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval of the Settlement, attorneys' fees, litigation expenses, Plaintiff's service award, settlement administration costs, and payment to the LWDA for

06/24/2021

PAGA penalties prior to the Final Fairness Hearing according to the time limits set by the Code of Civil Procedure and the California Rules of Court.

14. An implementation schedule is below:

Event	Date	Actual Date ¹
Defendant to provide Class Data to Settlement Administrator	15 calendar days after issuance of the preliminary approval order	June 30, 2021
Settlement Administrator to mail Notice Packets to Class Members	10 business days after receiving Class Information from Defendant	July 15, 2021
Deadline for Class Members to request exclusion from, submit disputes, or object to, the Settlement	60 calendar days after mailing of the Notice by the Settlement Administrator	September 13, 2021
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	16 court days before Final Fairness Hearing	October 13, 2021
Final Fairness Hearing:		November 4, 2021

15. Pending the Final Fairness Hearing, all proceedings in this action, other than proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this Order, are stayed.

16. Counsel for the parties are hereby authorized to utilize all reasonable procedures in connection with the administration of the Settlement which are not materially inconsistent with either this Order or the terms of the Settlement.

IT IS SO ORDERED.

Dated: June 22, 2021


Honorable Kenneth R. Freeman
Judge of the Superior Court

¹ These dates are based on the Court granting preliminary approval at the hearing, currently noticed for June 15, 2021.

Raul Nunez v. TK Services, Inc.
Los Angeles County Superior Court Case No. BC682512

~~PROPOSED~~ ORDER GRANTING PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

EXHIBIT B

EXHIBIT B

Expense Summary
Raul Nunez v. TK Services, Inc.

EXPENSE	AMOUNT
Mediation Costs (including Plaintiff's portion of mediator expenses and travel to mediation)	\$7,540.95
Expert Expenses	\$15,723.50
Filing, Service, and Messenger Fees	\$8,278.93
Courtcall/VCourt Costs	\$15.00
Copying Costs	\$726.00
Postage Costs	\$148.20
Traveling to/from Court Hearings	\$22.00
Travel to Client for Intake	\$17.15
PMK Deposition Expenses (deposition transcript costs for 2-day deposition)	\$2,783.03
Anticipated Costs for filing the Final Approval motion, court appearances, six quarterly Case Anywhere fees for Class Counsel through the date the final distribution declaration is filed, service fees, copying and postage	\$1,725.00
TOTAL:	\$35,580.76

EXHIBIT C

EXHIBIT C

LAFFEY MATRIX

[History](#)
[Case Law](#)
[See the Matrix](#)
[Contact us](#)
[Home](#)

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., DL v. District of Columbia, 267 F.Supp.3d 55, 69

(D.D.C. 2017)

* “Years Out of Law School” is calculated from June 1 of each year, when most law students graduate. “1-3” includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). “4-7” applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier “1-3” from June 1, 1996 until May 31, 1999, would move into tier “4-7” on June 1, 1999, and tier “8-10” on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT D

EXHIBIT D

Dana Joudi

From: FormAssembly <no-reply@formassembly.com> on behalf of DIR PAGA Unit
<lwdadonotreply@dir.ca.gov>
Sent: Wednesday, March 10, 2021 4:00 PM
To: Dana Joudi
Subject: Thank you for your Proposed Settlement Submission

03/10/2021 03:59:38 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm



State of California
Labor and Workforce Development Agency /
Department of Industrial Relations

Private Attorneys General Act (PAGA) – Filing

Proposed Settlement of PAGA case

PAGA Number (LWDA-CM-) : *

Please enter only the eight digit number after "LWDA-CM-" in the following format, "XXXXXX-XX".

[Search for PAGA Case number](#)

The timing of the deposit of settlement checks is governed by the provisions of the State Administrative Manual. This ministerial, administrative act of depositing a settlement check mandated by state procedures should not be construed as nor does it constitute an unconditional, voluntary and/or absolute acceptance of settlement proceeds or approval of the terms of any settlement agreement or judgment related to that check.

Your Information (Person Who is Filing)

Your First Name *

Scott

Your Last Name *

Lidman

Your Email Address *

djoudi@lidmanlaw.com

Your Street Name, Number and Suite/Apt *

2155 Campus Drive, Suite

Your Mobile Phone Number

Your City *

E Segundo

Your Work Phone Number

Your State *

California

Your Zip/Postal Code *

90245

Court and Hearing Information

Court *

LASC Spring Street

Court Case Number *

BC682512

Hearing Date (if any)

6/15/2021

Hearing Time

11 AM

Hearing Location

SSC-14, 312 N. Spring Str

Number of aggrieved employees *

156

Gross settlement amount *

1750000

Gross penalty amount *

50000

Penalties to LWDA *

37500

Date of proposed settlement *

01/15/2021

Proposed Settlement and Other Documents

Proposed Settlement *

 2021-01-15 T...xecuted).pdf

Other Attachment (if any)

 2021-03-10 TK...n (final).pdf

Other Attachment (if any)

[Remove](#) 2021-03-10 T...A Motion.pdf

Other Attachment (if any)

[Remove](#) 2021-03-10 T...A Motion.pdf

Other Attachment (if any)

[Remove](#) 2021-03-10 T...A Motion.pdf

Other Attachment (if any)

[Remove](#) 2021-03-10 T...A Motion.pdf

Other Attachment (if any)

[Remove](#) 2021-03-10 TK...I ISO PA.pdf

Other Attachment (if any)

[Remove](#) 2021-03-10 TK... FILING).pdf

Other Attachment (if any)

[Remove](#) 2021-03-10 POS.pdf

Other Attachment (if any)

[Remove](#) 2021-03-10 TK...n (final).pdf[Add Another Attachment](#)Should you have questions regarding this online form, please contact PAGInfo@dir.ca.gov

IMPORTANT NOTICE OF REDACTION RESPONSIBILITY: All filers must redact: Social Security or taxpayer identification numbers; personal addresses, personal telephone numbers, personal email addresses, dates of birth; names of minor children; & financial account numbers. This requirement applies to all documents, including attachments.

☒ I understand that, if I file, I must comply with the redaction rules consistent with this notice.

[Previous Page](#)[Submit](#)

EXHIBIT E

EXHIBIT E

From: [FormAssembly](#) on behalf of [DIR PAGA Unit](#)
To: [Gladys Beltran](#)
Subject: Thank you for your Court Order or Judgment Submission
Date: Thursday, June 24, 2021 5:11:39 PM

06/24/2021 05:11:30 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Court Order or Judgment

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm



State of California
Labor and Workforce Development Agency /
Department of Industrial Relations

Private Attorneys General Act (PAGA) – Filing

Court Order or Judgment in PAGA case

PAGA Number (LWDA-CM-) : *

Please enter only the eight digit number after "LWDA-CM-" in the following format, "XXXXXX-XX".

[Search for PAGA Case number](#)

Your Information (Person Who is Filing)

Your First Name *

Scott

Your Last Name *

Lidman

Your Email Address *

gbeltran@lidmanlaw.com

Your Street Name, Number and Suite/Apt *

2155 Campus Drive, Suite

Your Mobile Phone Number

4243224772

Your City *

El Segundo

Your Work Phone Number

Your State *

California

Your Zip/Postal Code *

90245

Court Case Name and Plaintiff Information

Court Case Name

Raul Nunez v TK Services,

Plaintiff Name

Raul Nunez

Order or Judgment Details

Gross settlement amount *

1750000

Gross penalties *

50000

Penalties to LWDA *

37500

Fee award *

583,333

Court Order, Judgment File and Other Files

Court Order or Judgment *

 2021-06-22 T...nting PA.pdf

Other Attachment

 No file chosen[Add Another Attachment](#)

Should you have questions regarding this online form, please contact PAGAInfo@dir.ca.gov

IMPORTANT NOTICE OF REDACTION RESPONSIBILITY: All filers must redact: Social Security or taxpayer identification numbers; personal addresses, personal telephone numbers, personal email addresses, dates of birth; names of minor children; & financial account numbers. This requirement applies to all documents, including attachments.

☒ I understand that, if I file, I must comply with the redaction rules consistent with this notice.