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

OSCAR GERARDO, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

STRATASYS DIRECT, INC., a California  
corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Case No. 20STCV44366

*[Assigned for all purposes to the Honorable William  
F. Highberger, Dept. SSC-10]*

**DECLARATION OF ELIZABETH  
NGUYEN IN SUPPORT OF MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Date: March 22, 2022  
Time: 1:30 p.m.  
Dept.: SSC-10

Action Filed: November 17, 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 Plaintiff  
3 Oscar Gerardo (“Plaintiff”) and the proposed Settlement Class in the above-captioned matter. I am a  
4 member in good standing of the bar of the State of California and am admitted to practice in this Court.  
5 I have personal knowledge of the facts stated in this declaration and could testify competently to them  
6 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. During  
9 law school, I also worked as a law clerk in the Enforcement Unit of the Office of the Chief Trial Counsel  
10 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 to  
19 Shareholder in 2015, and was elevated to participating Shareholder in 2017. Since October 2007, my  
20 practice has been and continues to be exclusively labor and employment law, with a strong emphasis  
21 on wage and hour class actions venued in both state and federal courts. During this time period and my  
22 legal career in general, I also worked on a number of single and multi-plaintiff wage and hour matters  
23 as well. During my employment at Littler Mendelson, I was a member of its Class Action Practice  
24 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; drafting  
4 motions to consolidate related matters; interviewing putative class members and obtaining declarations  
5 in connection with class certification; drafting oppositions to motions for class certification; conducting  
6 exposure analyses to assess the strengths and weaknesses of asserted claims, the likelihood of prevailing  
7 at class certification and potential damages resulting from such claims; drafting mediation briefs;  
8 serving as the primary contact to in-house counsel; deposing named plaintiffs and putative class  
9 members; deposing retained expert witnesses; and defending the depositions of corporate witnesses. I  
10 also was involved in the negotiations and settlements of many large wage and hour class actions. In  
11 short, I played an integral role in all aspects of litigation from the inception of a matter through and  
12 beyond class certification. I also supervised the work of several associate attorneys who were staffed  
13 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 Court,  
20 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.<sup>1</sup>
- 4           ▶ *Adams v. Luxottica Retail North America, Inc.*, Case No. 07CC01346, California  
5           Superior Court, County of Orange, Honorable Judge Thierry Patrick Colaw,  
6           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, United  
10          States District Court, Central District of California, Honorable Judge Dale  
11          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 States  
16          District Court, Central District of California, Honorable Judge Margaret Morrow,  
17          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.
- 25          ▶ *Rumohr v. Comerica Bank, et al.*, Case No. CGC-11-508433, California Superior  
26          Court, County of San Francisco.

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28 <sup>1</sup> This matter was consolidated and litigated collectively with Case Nos. BC380923, BC 381523 and BC 406663.

1           ▶     *Robertson v. FedEx National LTL, Inc.*, Case No. 09-CV-05016-DSF-FFM,  
2                     United States District Court, Central District of California, Honorable Judge Dale  
3                     Fischer, presiding.

4           ▶     *Wittman v. FedEx National LTL, Inc.*, Case No. 09-CV-03663-DSF-FFM, United  
5                     States District Court, Central District of California, Honorable Judge Dale  
6                     Fischer, presiding.

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

23          8.     I have been appointed Class Counsel in: *Guardado v. Wesley Allen, Inc.*, Case No.  
24   BC683027, California Superior Court, County of Los Angeles, Honorable Judge Carolyn B. Kuhl  
25   presiding; *Rodriguez v. Satco, Inc.*, Case No. BC682137, California Superior Court, County of Los  
26   Angeles, Honorable Judge Ann I. Jones presiding; *Ong v. Howard's Appliances, Inc.*, Case No. 30-  
27   2017-00964213-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge  
28

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

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. The details of the work completed by my firm and/or my co-counsel are set forth in  
7 the declaration of Scott M. Lidman filed concurrently herewith.

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

10 Executed on February 17, 2022, at El Segundo, California.

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Elizabeth Nguyen