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Attorneys for Plaintiff
MAYRA CORTES

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

MAYRA CORTES, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

WETMORE TOOL AND ENGINEERING
COMPANY, a Delaware corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No. CIVDS2016160

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

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

Date: June 14, 2021
Time: 10:00 a.m.
Dept.: S-26

Action Filed: July 23, 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 Mayra
3 Cortes (“Plaintiff”) and the proposed Settlement Class in the above-captioned matter. I am a member in
4 good standing of the bar of the State of California and am admitted to practice in this Court. I have
5 personal knowledge of the facts stated in this declaration and could testify competently to them if called
6 upon to do so.

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

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

20 4. I have been appointed Class Counsel in *Hanke v. C&W Facility Services, Inc.*, Case No.
21 CIVDS1814412, California Superior Court, County of San Bernardino, Honorable Judge David Cohn
22 presiding; *Molina v. Mader News, Inc.*, Case No. BC685960, California Superior Court, County of Los
23 Angeles, Honorable Judge Yvette M. Palazuelos presiding; *Alvarez v. Salamander Fire Protection, Inc.*,
24 Case No. BC688326, California Superior Court, County of Los Angeles, Honorable Judge William F.
25 Highberger presiding; *Fregoso v. Amerigas Propane, Inc.*, Case No. BC697973, California Superior
26 Court, County of Los Angeles, Honorable Rafael A. Ongkeko presiding; *Teran v. Western Plastics, Inc.*,
27 Case No. RIC1722619, California Superior Court, County of Riverside, Honorable Judge Sunshine Sykes
28 presiding; *Villegas de Torres v. El Monte Superstore Inc.*, Case No. BC688477, California Superior Court,

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

12 5. The details of the work completed in this case by me and the other attorneys in my firm are
13 set forth in the declaration of Elizabeth Nguyen filed concurrently herewith.

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

16 Executed on April 19, 2021 at El Segundo, California.

17 
18 _____
19 Milan Moore