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Attorneys for Plaintiff MAYRA CORTES

[Additional counsel on following page]

**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 FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT, CLASS REPRESENTATIVE'S
SERVICE AWARD, AND ATTORNEYS' FEES
AND COSTS**

Date: October 20, 2021
Time: 10:00 a.m.
Dept.: S-26

Concurrently filed with:

- ❖ *Notice of Motion and Motion for Final Approval of Class Action Settlement, Class Representative's Service Award, and Attorneys' Fees and Costs; MPA in Support Thereof*
- ❖ *Declaration of Elizabeth Nguyen*
- ❖ *Declaration of Paul K. Haines*
- ❖ *Declaration of Scott M. Lidman*
- ❖ *Declaration of Plaintiff Mayra Cortes*
- ❖ *Declaration of Elizabeth Kruckenberg*
- ❖ *Proposed Order Granting Plaintiff's Motion for Final Approval*
- ❖ *Proposed Final Judgment*

Action Filed: July 23, 2020
Trial Date: None Set

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Attorneys for Plaintiff MAYRA CORTES

1 I, MILAN MOORE, declare as follows:

2 1. I am an Associate with Lidman Law, APC, counsel for the named Plaintiff Mayra
3 Cortes (“Plaintiff”) and the proposed Settlement Class in the above-captioned matter. I am a member
4 in 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
6 called upon to do so.

7 2. I am a 2015 graduate of UConn School of Law. I was admitted to the California State
8 Bar 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
14 counsel, drafting and responding to written discovery, preparing for and taking and defending
15 depositions, drafting and opposing motions for remand, demurrers and motions to strike, motions to
16 compel, drafting mediation briefs, and attending mediations.

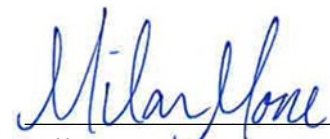
17 3. Since June 11, 2018, I have worked as an associate at my current firm, Lidman Law,
18 APC. I am currently staffed on approximately seventy (70) active wage and hour class action lawsuits
19 in both state and federal court.

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

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

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

15 I declare under penalty of perjury under the laws of the State of California that the foregoing
16 is true and correct. Executed on September 24, 2021, at El Segundo, California.

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18 
19 Milan Moore