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GILBERTO RODRIGUEZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES**

GILBERTO RODRIGUEZ, as an individual  
and on behalf of all others similarly situated,

Plaintiff,

vs.

CARDINAL PAINT AND POWDER, INC., a  
Nevada corporation; and DOES 1 through 100,  
inclusive,

Defendants.

Case No. 20STCV14711

*[Assigned for all purposes to the Hon. Yvette M.  
Palazuelos, Dept. SSC-9]*

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

Date: August 12, 2021

Time: 10:00 a.m.

Dept.: SSC-9

Complaint Filed: April 15, 2020

Trial Date: None

1 I, MILAN MOORE, declare as follows:

2 1. I am an Associate with Lidman Law, APC, counsel for the named Plaintiff Gilberto  
3 Rodriguez (“Plaintiff”) and the proposed Class in the above-captioned matter. I am a member in good  
4 standing of the bar of the State of California and am admitted to practice in this Court. I have personal  
5 knowledge of the facts stated in this declaration and could testify competently to them if called upon to  
6 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,

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

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

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

Executed on June 23, 2021 at El Segundo, California.

  
Milan Moore