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MARLON PEREZ and BERENICE QUIROZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MARLON PEREZ, as an individual, and
BERENICE QUIROZ, as an individual, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

KUHNS ENTERPRISES, INC., doing business
as BRAND ENHANCE PARKING &
HOSPITALITY, a California corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No.: 25STCV06393

*[Assigned for all purposes to the Hon. Elaine Lu,
Dept. SSC-9]*

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

Date: September 22, 2026

Time: 8:30 a.m.

Dept.: SSC-9

Briefing Schedule

Motion Due: August 10, 2026

Opposition Due: August 25, 2026

Reply Due: September 8, 2026

1 I, MILAN MOORE, declare as follows:

2 1. I am a Partner at Lidman Law, APC, counsel for Plaintiffs Marlon Perez and Berenice
3 Quiroz (“Plaintiffs”) 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 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
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. Beginning on June 11, 2018, I have worked as an associate at my current firm, Lidman
18 Law, APC. In December 2024, I was promoted to Partner. I am currently staffed on approximately
19 seventy (70) active wage and hour class action lawsuits in both 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
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1 presiding; *Villegas de Torres v. El Monte Superstore Inc.*, Case No. BC688477, California Superior
2 Court, County of Los Angeles, Honorable Judge Daniel J. Buckley presiding; *Guzman v. Century Blinds*,
3 Case No. RIC1723654, California Superior Court, County of Riverside, Honorable Judge Sunshine S.
4 Sykes presiding; *George v. Convergence Marketing*, Case No. CIVDS1901039, California Superior
5 Court, County of San Bernardino, Honorable Judge David S. Cohn presiding; *Romero v. Fillmore*
6 *Hospitality, LLC*, Case No. BC705667, California Superior Court, County of Los Angeles, Honorable
7 Judge Maren E. Nelson presiding; *Davis v. WeDriveU*, Case No. 18CV322578, California Superior
8 Court, County of Santa Clara, Honorable Judge Brian C. Walsh presiding; *Acuna v. Canton Food Co.*,
9 *Inc.*, Case No. BC685001, California Superior Court, County of Los Angeles, Honorable Judge David S.
10 Cunningham presiding; and *Contreras v. Worldwide Flight Services, Inc.*, Case No. 2:18-cv-06036-PSG-
11 SS, United States District Court for the Central District of California, the Honorable Judge Philip S.
12 Gutierrez presiding.

13 5. In 2023, 2024 and 2025, Thomson Reuters and Los Angeles Magazine recognized me
14 as a Top Young Attorney in Southern California in the annual Rising Star Edition of Super Lawyer.
15 This is an honor awarded to no more than two and a half percent of attorneys under the age of forty in
16 Southern California each year.

17 6. In 2026, Thomson Reuters recognized me as a “Super Lawyer” in the annual Super
18 Lawyer magazine, an honor awarded to no more than five percent of all attorneys in Southern
19 California each year.

20 7. The declaration of my co-counsel, Scott M. Lidman, filed concurrently herewith, sets forth
21 the of the work completed in this case by other attorneys in my firm and/or attorneys in our co-counsel’s
22 firm.

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

25 Executed on August 3, 2026, at El Segundo, California.

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Milan Moore