

**LIDMAN LAW, APC**

Scott M. Lidman (SBN 199433)

slidman@lidmanlaw.com

Milan Moore (SBN 308095)

mmoore@lidmanlaw.com

Tiara Gose-Hardy (SBN 323823)

tgose@lidmanlaw.com

2155 Campus Drive, Suite 150

El Segundo, California 90245

Tel: (424) 322-4772

Fax: (424) 322-4775

Attorneys for Plaintiffs

MARLON PEREZ and BERENICE QUIROZ

**HAINES LAW GROUP, APC**

Paul K. Haines (SBN 248226)

phaines@haineslawgroup.com

2155 Campus Drive, Suite 180

El Segundo, California 90245

Tel: (424) 292-2350

Fax: (424) 292-2355

Attorneys for Plaintiffs

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 TIARA GOSE-  
HARDY IN SUPPORT 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, TIARA GOSE-HARDY, declare as follows:

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

7 2. I am a 2018 graduate of Whittier Law School. I was admitted to the California State Bar  
8 in December 2018 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  
10 several employment litigation firms, 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, demurrers, motions to compel, drafting mediation briefs,  
16 and attending mediations.

17 3. Since July 8, 2024, I have worked as an Associate at my current firm, Lidman Law,  
18 APC. I am currently staffed on approximately ninety (90) active wage and hour class action lawsuits  
19 in state court.

20 4. I have been appointed Class Counsel in *Jimenez v. Signtech Electrical Advertising, Inc.*,  
21 Case No. 37-2023-00038995-CU-OE-CTL, California Superior Court, County of San Diego,  
22 Honorable Judge James A. Mangione presiding; *Tapia v. Franco Whole Foods, LLC*, Case No. 37-  
23 2023-00046908-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Gregory  
24 W. Pollack presiding; *Mendoza-Hernandez v. Pacific Snow Valley Resort, LLC*, Case No.  
25 CIVSB2314151, California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz  
26 presiding; *Soto v. United Scaffold*, Case No. 37-2022-00042002-CU-OE-CTL, California Superior  
27 Court, County of San Diego, Honorable Michael T. Smyth presiding.  
28

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

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

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

*Tiara Gose-Hardy*  
Tiara Gose-Hardy