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BIDKAR SEQUEIRA and JUAN SALAS

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**FOR THE COUNTY OF LOS ANGELES**

BIDKAR SEQUEIRA, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

MOBILE CLEAR SHIELD, LLC, a California  
limited liability company; and DOES 1 through  
100, inclusive,

Defendants.

Case No.: 22STCV31788

Related to Lead Case No.: 22STCV31784

*[Assigned for all purposes to the Hon. David S.  
Cunningham III, Dept. SSC-11]*

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

Date: May 22, 2024

Time: 10:00 a.m.

Dept.: SSC-11

1 I, MILAN MOORE, declare as follows:

2 1. I am an Associate with Lidman Law, APC, counsel for named Plaintiffs Bidkar Sequeira  
3 and Juan Salas ("Plaintiffs") and the proposed Settlement Class in the above-captioned matter. I am a  
4 member in good standing of the bar of the State of California and am admitted to practice in this Court.  
5 I have personal knowledge of the facts stated in this declaration and could testify competently to them  
6 if 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 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,*  
24 *Inc.*, Case No. BC688326, California Superior Court, County of Los Angeles, Honorable Judge  
25 William F. Highberger presiding; *Fregoso v. Amerigas Propane, Inc.*, Case No. BC697973, California  
26 Superior Court, County of Los Angeles, Honorable Rafael A. Ongkeko presiding; *Teran v. Western*  
27 *Plastics, Inc.*, Case No. RIC1722619, California Superior Court, County of Riverside, Honorable Judge  
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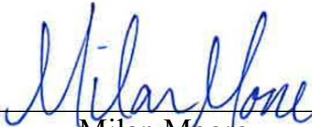
1 Sunshine Sykes presiding; *Villegas de Torres v. El Monte Superstore Inc.*, Case No. BC688477,  
2 California Superior Court, County of Los Angeles, Honorable Judge Daniel J. Buckley presiding;  
3 *Guzman v. Century Blinds*, Case No. RIC1723654, California Superior Court, County of Riverside,  
4 Honorable Judge Sunshine S. Sykes presiding; *George v. Convergence Marketing*, Case No.  
5 CIVDS1901039, California Superior Court, County of San Bernardino, Honorable Judge David S.  
6 Cohn presiding; *Romero v. Fillmore Hospitality, LLC*, Case No. BC705667, California Superior Court,  
7 County of Los Angeles, Honorable Judge Maren E. Nelson presiding; *Davis v. WeDriveU*, Case No.  
8 18CV322578, California Superior Court, County of Santa Clara, Honorable Judge Brian C. Walsh  
9 presiding; *Acuna v. Canton Food Co., Inc.*, Case No. BC685001, California Superior Court, County of  
10 Los Angeles, Honorable Judge David S. Cunningham presiding; and *Contreras v. Worldwide Flight*  
11 *Services, Inc.*, Case No. 2:18-cv-06036-PSG-SS, United States District Court for the Central District  
12 of California, the Honorable Judge Philip S. Gutierrez presiding.

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

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

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

22 Executed on February 20, 2024, at El Segundo, California.

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24   
25 Milan Moore  
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