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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

REMBER GUILLEN and JUAN SALAS, as
individuals and on behalf of all others similarly
situated,

Plaintiffs,

vs.

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

Defendants.

Case No.: 22STCV31784

Related to Case No.: 22STCV31788

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

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

Date: January 13, 2026
Time: 9:00 a.m.
Dept.: SSC-11

1 I, MILAN MOORE, declare as follows:

2 1. I am a Partner at Lidman Law, APC, counsel for named Plaintiffs Rember Guillen and
3 Juan Salas (hereafter collectively referred to as “Plaintiffs”) and the proposed Settlement Class in the
4 above-captioned matter. I am a member in good standing of the bar of the State of California and am
5 admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and
6 could testify competently to them 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 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. Since June 11, 2018, I have worked as an associate at my current firm, Lidman Law, APC.
18 In December 2024, I was promoted to Partner. I am currently staffed on approximately seventy (70)
19 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
28

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 and 2024, Thomson Reuters and Los Angeles Magazine recognized me as a Top
14 Young Attorney in Southern California in the annual Rising Star Edition of Super Lawyer. This is an
15 honor 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 forth
18 the of the work completed in this case by attorneys in our co-counsel's firm and/or other attorneys in my
19 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 October 20, 2025, at El Segundo, California

23 

24 _____
Milan Moore