

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 Plaintiff
RAFAEL SOTO

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 Plaintiff
RAFAEL SOTO

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

RAFAEL SOTO, as an individual and on behalf
of all others similarly situated,

Plaintiff,

vs.

UNITED SCAFFOLD, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 37-2022-00042002-CU-OE-CTL

*[Assigned for All Purposes to Hon. Michael T.
Smyth, Dept. C-67]*

**DECLARATION OF TIARA GOSE-
HARDY IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
REPRESENTATIVE'S SERVICE
AWARD, AND ATTORNEYS' FEES
AND COSTS**

Date: December 5, 2025
Time: 9:00 a.m.
Dept.: C-67

Action Filed: October 19, 2022
Trial Date: None Set

1 I, TIARA GOSE-HARDY, declare as follows:

2 1. I am an Associate with Lidman Law, APC, counsel for named Plaintiff Rafael Soto
3 (“Plaintiff”) and the proposed Settlement 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
6 to do so.

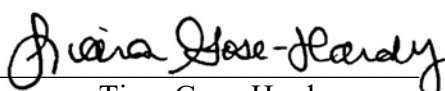
7 2. I am a 2018 graduate of Whittier Law School. I was admitted to the California State Bar
8 in December 2018 after passing the bar exam on my first attempt. Since that time, I have practiced
9 exclusively in the area of employment litigation. Prior to joining Lidman Law, APC, I worked for
10 several 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 seventy (70) active wage and hour class action lawsuits
19 in state court.

20 4. The declaration of my co-counsel, Scott M. Lidman filed concurrently herewith, sets
21 forth the of the work completed in this case by attorneys in our co-counsel’s firm and/or other attorneys
22 in my 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 November 5, 2025, at El Segundo, California.

26 
27 Tiara Gose-Hardy
28