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LUIS BORQUEZ

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

LUIS BORQUEZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

OXFORD HOTELS AND RESORTS, LLC, a
Delaware limited liability company dba THE
GODFREY HOTEL HOLLYWOOD; and
DOES 1 through 100, inclusive,
Defendants.

Case No.: 22STCV35743

*[Case Assigned for all purposes to the Hon.
Carolyn B. Kuhl, SSC-12]*

**DECLARATION OF TIARA GOSE-
HARDY IN SUPPORT MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: February 26, 2026
Time: 10:30 a.m.
Dept.: SSC-12

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

2 1. I am an Associate with Lidman Law, APC, counsel for named Plaintiff Luis Borquez
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 to
6 do so.

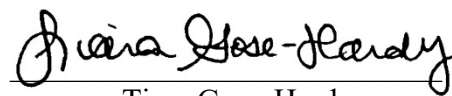
7 2. I am a 2018 graduate of Whittier Law School. I was admitted to the California State Bar
8 in December 2018 after passing the bar exam on my first attempt. Since that time, I have practiced
9 exclusively in the area of employment litigation. Prior to joining Lidman Law, APC, I worked for several
10 employment litigation firms, where I successfully represented employees in discrimination, harassment,
11 retaliation and wrongful termination cases in both state and federal court. While non-exhaustive, the type
12 of work I performed included: conducting client intakes, performing pre-filing research and analysis,
13 drafting complaints, attending court hearings, corresponding with opposing counsel, drafting and
14 responding to written discovery, preparing for and taking and defending depositions, drafting and
15 opposing motions, demurrers, motions to compel, drafting mediation briefs, and attending mediations.

16 3. Since July 8, 2024, I have worked as an associate at my current firm, Lidman Law, APC.
17 I am currently staffed on approximately seventy (70) active wage and hour class action lawsuits in state
18 court.

19 4. The declaration of my co-counsel, Milan Moore, filed concurrently herewith, sets forth
20 the of the work completed in this case by attorneys in our co-counsel’s firm and/or other attorneys in my
21 firm.

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

24 Executed on November 7, 2025, at El Segundo, California.

25 
26 Tiara Gose-Hardy
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