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

MATTHEW CRUZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

CAT SPEC, LTD. L.P., a Texas limited
partnership; STRONGHOLD, LTD. LIMITED
PARTNERSHIP, a Texas limited partnership;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 23STCV06904

*[Assigned for all purposes to the Hon. Samantha P.
Jessner, Dept. SSC-7]*

**DECLARATION OF SCOTT M.
LIDMAN IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
REPRESENTATIVE SERVICE AWARD,
AND ATTORNEYS' FEES AND COSTS**

Date: July 21, 2025
Time: 10:00 a.m.
Dept.: SSC-7

1 I, SCOTT M. LIDMAN, declare as follows:

2 1. I am a shareholder and principal of the law firm Lidman Law, APC, and counsel for the
3 named Plaintiff Matthew Cruz (“Plaintiff”) and the proposed Settlement Class in the above-captioned
4 matter. I am a member in good standing of the bar of the State of California and am admitted to practice
5 in this Court. I have personal knowledge of the facts stated in this declaration and could testify
6 competently to them if called upon to do so.

7 2. I am a 1998 graduate of Santa Clara University School of Law, where I graduated *summa*
8 *cum laude*. During law school, I worked as a summer associate for the international employment law
9 firm of Littler Mendelson, P.C., located in Los Angeles, California.

10 3. Since graduating from law school, my practice has focused exclusively on employment
11 litigation. In September 1998, I began working as an associate attorney at the international law firm of
12 Littler Mendelson P.C., at its Los Angeles office, which according to its website is the largest law firm
13 in the world exclusively devoted to representing management in employment, employee benefits and
14 labor law matters.

15 4. In 2000, I left Littler Mendelson to work at the Los Angeles office of Jones Day, which
16 was at the time one of the largest international firms in the world. During my employment at Jones
17 Day, I worked exclusively in the labor and employment department. In or around 2003, I went to work
18 at the law firm of Loeb & Loeb, again working exclusively in the Labor & Employment department. In
19 2008, I returned to Littler Mendelson, was promoted to Shareholder in 2009, and from 2008 until the
20 end of 2017, I practiced exclusively labor and employment law, with a strong emphasis and most of my
21 time working on wage and hour class actions venued in both state and federal courts. During that time
22 and my legal career in general, I also worked on a number of single and multi-plaintiff wage and hour
23 matters as well.

24 5. During my employment at Littler Mendelson, I played a significant role in the class
25 actions that I was staffed on, and ran many on my own both as an Of Counsel and as a Shareholder. In
26 particular, I received a wide-array of wage and hour class action experience performing the following
27 types of tasks: drafting demurrers, motions to strike and/or dismiss; removing actions from state court
28

1 to federal court; drafting and responding to written discovery; drafting and opposing discovery related
2 motions; arguing discovery related motions; drafting motions to consolidate related matters;
3 interviewing putative class members and obtaining declarations in connection with class certification;
4 drafting oppositions to motions for class certification; drafting motions for decertification following
5 class certification; conducting exposure analyses to assess the strengths and weaknesses of asserted
6 claims, the likelihood of prevailing at class certification and potential damages resulting from such
7 claims; drafting mediation briefs; serving as the primary contact to in-house counsel; deposing named
8 plaintiffs and putative class members; deposing retained expert witnesses; and defending the depositions
9 of corporate witnesses. I also was involved in the negotiations and settlements of many large wage and
10 hour class actions. In short, I played an integral role in all aspects of litigation from the inception of a
11 matter through and beyond class certification. I also supervised the work of several junior attorneys
12 who were staffed on the same wage and hour class actions.

13 6. Although not exhaustive, below is a list of many of the wage and hour class and PAGA
14 actions that I performed substantial work on while I was a shareholder at Littler Mendelson:

- 15 ► *Ortega v. J.B. Hunt Transport, Inc.*, Case No. 07-cv-8336-RGK-AFMx, United
16 States District Court, Central District of California, Honorable Gary Klausner,
17 presiding¹.
- 18 ► *Aceves v. J.B. Hunt Transport, Inc.*, Case No. CIVDS1306133, California
19 Superior Court, County of San Bernardino, Honorable Michael Sachs, presiding.
- 20 ► *Moreno v. J.B. Hunt Transport, Inc.*, Case No. BC388612, California Superior
21 Court, County of Los Angeles, Honorable Mel Red Recana, presiding.
- 22 ► *Newcomb v. J.B. Hunt Transport, Inc.*, Case No. RG16815734, California
23 Superior Court, County of Alameda, Honorable Winifred Smith, presiding.
- 24 ► *Vaquero v. Stoneledge Furniture, LLC, et al.*, Case No. 12-cv-08590-PA-MAN,
25 United States District Court, Central District of California, Honorable Percy
26 Anderson, presiding.

27
28 ¹ My work on this matter including proceedings not only in District Court, but also work before the United States Court of Appeals for the Ninth Circuit as well as the United States Supreme Court.

- 1 ► *Vaquero v. Stoneledge Furniture, LLC, et al.*, Case No. BC388612, California
2 Superior Court, County of Los Angeles, Honorable Elihu Berle, presiding.²
- 3 ► *Dugan v. Stoneledge Furniture, LLC*, Case No. 16-cv-01125-PA-FFMx, United
4 States District Court, Central District of California, Honorable Percy Anderson,
5 presiding.
- 6 ► *Klune v. Stoneledge Furniture, LLC*, Case No. 14-cv-03986-PA-FFMx, United
7 States District Court, Central District of California, Honorable Percy Anderson,
8 presiding.
- 9 ► *Diaz v. ABM Industries, Inc.; Ampco Parking*, Case No. BC362932, California
10 Superior Court, County of Los Angeles, Honorable Jane Johnson, presiding.³
- 11 ► *Adams v. Luxottica Retail North America, Inc.*, Case No. 07CC01346, California
12 Superior Court, County of Orange, Honorable Thierry Patrick Colaw, presiding.
- 13 ► *Sakkab v. Luxottica Retail North America, Inc.*, Case No. 12-cv-00436-GPC-
14 KSC, United States District Court, Southern District of California.⁴
- 15 ► *Page v. Oakley, Inc.*, Case No. FCS041512, California Superior Court, County
16 of Solano, Honorable Paul Berman, presiding.
- 17 ► *Ramirez v. Oakley, Inc.*, Case No. 30-2014-00731617-CU-OE-CJC California
18 Superior Court, County of Orange, Honorable William Claster, presiding.
- 19 ► *Ramirez v. Oakley, Inc.*, Case No. 30-2014-00723846-CU-DE-CXC, California
20 Superior Court, County of Orange, Honorable William Claster, presiding.
- 21 ► *Sierra v. Oakley, Inc.*, Case No. 13-cv-00319-AG-JPR, United States District
22 Court, Central District of California, Honorable Andrew Guilford, presiding.⁵
- 23
- 24
- 25

26 ² My work on this matter included proceedings not only in the trial court, but also before the California Courts of Appeal
27 and the California Supreme Court.

28 ³ This matter was consolidated and litigated collectively with Case Nos. BC380923, BC 381523 and BC 406663.

⁴ The work I performed on this case included work in the United States Court of Appeals for the Ninth Circuit.

⁵ The work I performed on this case included work in the United States Court of Appeals for the Ninth Circuit.

- 1 ► *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United
2 States District Court, Central District of California, Honorable Margaret Morrow,
3 presiding.
- 4 ► *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United
5 States District Court, Central District of California, Honorable Margaret Morrow,
6 presiding.
- 7 ► *Khelghatian v. Comerica Bank, et al.*, Case No. 11-cv-7689-DSF-FFMx, United
8 States District Court, Southern District of California, Honorable John A.
9 Houston, presiding.
- 10 ► *Babasa v. Comerica Bank, et al.*, Case No. 11-cv-0595-JAH-BGS, United States
11 District Court, Central District of California, Honorable Margaret Morrow,
12 presiding.
- 13 ► *Bernal v. Comerica Bank, et al.*, Case No. 11-cv-01298-JAH-BGS, United States
14 District Court, Central District of California, Honorable Margaret Morrow,
15 presiding.
- 16 ► *Khalili v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United
17 States District Court, Northern District of California.
- 18 ► *Granata v. Comerica Bank, et al.*, Case No. 37-2011-00086316-CU-OE-CTL,
19 California Superior Court, County of San Diego, Honorable Jeffrey B. Barton,
20 presiding.
- 21 ► *Mathews v. Comerica Bank, et al.*, Case No. 111CV194781, California Superior
22 Court, County of Santa Clara.
- 23 ► *Gallegos v. Comerica Bank, et al.*, Case No. BC455515, California Superior
24 Court, County of Los Angeles, Honorable Terry Green, presiding.
- 25 ► *Rumohr v. Comerica Bank, et al.*, Case No. CGC-11-508433, California Superior
26 Court, County of San Francisco.

1 ► *Smith v. Werner Enterprises*, Case No. 15-cv-02978-RS, United States District
2 Court, Northern District of California, Honorable Richard Seeborg, presiding.

3 7. In January 2018, I voluntarily resigned from Littler Mendelson in order to open my own
4 law firm, Lidman Law, APC, to represent employees with work-related claims, including primarily
5 wage and hour claims and almost exclusively on a class-action basis. I am the President and Shareholder
6 of Lidman Law. Currently, over ninety percent (90%) of my practice is dedicated exclusively to the
7 prosecution of wage and hour class actions, and I am currently responsible for prosecuting over sixty-
8 five (65) wage and hour class actions filed in State courts throughout California, with several of them
9 having been removed to Federal courts. I believe that my professional experience renders me more than
10 qualified to serve as class counsel in this lawsuit involving claims of underpaid overtime and minimum
11 wages, meal and rest period violations, and derivative penalty claims. Not only have I litigated dozens
12 of wage and hour cases throughout my career involving similar claims, including the wage and hour
13 class actions identified above, I have litigated similar claims from both plaintiff and defense
14 perspectives. As a result, I am able to realistically assess and evaluate the facts and legal arguments
15 that can be made in pursuit and defense of similar wage and hour claims, as well as those facts and
16 arguments in support and in opposition to class certification. Consequently, I am able to appreciate the
17 significant risks, uncertainties, and delay involved in wage and hour class action litigation.

18 8. I have been appointed Class Counsel in: *Guardado v. Wesley Allen, Inc.*, Case No.
19 BC683027, California Superior Court, County of Los Angeles, Honorable Judge Carolyn B. Kuhl
20 presiding; *Rodriguez v. Satco, Inc.*, Case No. BC682137, California Superior Court, County of Los
21 Angeles, Honorable Judge Ann I. Jones presiding; *Ong v. Howard's Appliances, Inc.*, Case No. 30-
22 2017-00964213-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge
23 William Claster presiding; *Hanke v. C&W Facility Services, Inc.*, Case No. CIVDS1814412,
24 California Superior Court, County of San Bernardino, Honorable Judge David Cohn presiding; *Molina*
25 *v. Mader News, Inc.*, Case No. BC685960, California Superior Court, County of Los Angeles,
26 Honorable Judge Yvette M. Palazuelos presiding; *Alvarez v. Salamander Fire Protection, Inc.*, Case
27 No. BC688326, California Superior Court, County of Los Angeles, Honorable Judge William F.

Highberger presiding; *Rodriguez v. H.F. Cox, Inc.*, Case No. BC653164, California Superior Court, County of Los Angeles, Honorable Judge Carolyn B. Kuhl presiding; *Fregoso v. Amerigas Propane, Inc.*, Case No. BC697973, California Superior Court, County of Los Angeles, Honorable Judge Rafael A. Ongkeko presiding; *Teran v. Western Plastics, Inc.*, Case No. RIC1722619, California Superior Court, County of Riverside, Honorable Judge Sunshine Sykes presiding; *Villegas de Torres v. El Monte Superstore Inc.*, Case No. BC688477, California Superior Court, County of Los Angeles, Honorable Judge Daniel J. Buckley presiding; *Huynh v. Polypeptide Laboratories, Inc.*, Case No. BC680872, California Superior Court, County of Los Angeles, Honorable Judge Rafael A. Ongkeko presiding; *Guzman v. Century Blinds*, Case No. RIC1723654, California Superior Court, County of Riverside, Honorable Judge Sunshine S. Sykes presiding; *George v. Convergence Marketing*, Case No. CIVDS1901039, California Superior Court, County of San Bernardino, Honorable Judge David S. Cohn presiding; *Coffee, et al. v. Flyers Transportation Energy, LLC*, Case No. 34-2017-00222084, California Superior Court, County of Sacramento, Honorable Judge Alan G. Perkins presiding; *Romero v. Fillmore Hospitality, LLC*, Case No. BC705667, California Superior Court, County of Los Angeles, Honorable Judge Maren E. Nelson presiding; *Wennerstrom, et al. v. Giant Inland Empire R.V. Center*, Case No. CIVDS1617291, California Superior Court, County of San Bernardino, Honorable Judge David S. Cohn presiding; *Contreras, et al. v. Letter Ride, LLC*, Case No. 37-2018-00020841-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Judge Eddie C. Sturgeon presiding; *Davis v. WeDriveU*, Case No. 18CV322578, California Superior Court, County of Santa Clara, Honorable Judge Brian C. Walsh presiding; *Acuna v. Canton Food Co., Inc.*, Case No. BC685001, California Superior Court, County of Los Angeles, Honorable Judge David S. Cunningham presiding; and *Contreras v. Worldwide Flight Services, Inc.*, Case No. 2:18-cv-06036-PSG-SS, United States District Court for the Central District of California, the Honorable Judge Philip S. Gutierrez presiding.

9. As co-lead counsel for Plaintiff and the proposed Settlement Class, I have been intimately involved in every aspect of this case from its inception through the present, and I believe that the proposed Settlement is a favorable result for the Settlement Class Members under the circumstances presented.

1 10. On March 29, 2023, Plaintiff filed the instant putative class action complaint. On March
2 29, 2023, Plaintiff submitted a letter to the California Labor & Workforce Development Agency
3 (“LWDA”) and Defendants advising of his intention of filing a claim under the Private Attorneys
4 General Act of 2004 (“PAGA”) based on the Labor Code violations as alleged in his operative
5 complaint. On June 16, 2023, after exhausting his administrative remedies, Plaintiff filed a First
6 Amended Class and Representative Action Complaint adding a cause of action for civil penalties under
7 the PAGA. Plaintiff’s primary claims are that Defendants: (1) failed to pay all overtime wages owed;
8 (2) failed to pay all minimum wages owed; (3) failed to provide meal periods; (4) failed to authorize
9 and permit all rest periods; (5) failed to provide accurate, itemized wage statements; (6) failed to
10 indemnify all necessary business expenditures; (7) failed to pay all wages owed upon termination; (8)
11 engaged in unfair competition; and (9) are liable for civil penalties under the PAGA.

12 11. In advance of mediation, Defendants produced a 17 percent sampling of timekeeping
13 and payroll data for the putative class, as well as their wage and hour policies and other relevant
14 documents and information relevant to the claims alleged.

15 In addition to the representative sampling, Defendants produced key data points and all relevant
16 written wage and hour policies in effect during the relevant time periods. Specifically, Plaintiff was
17 provided with the following:

- 18 • Plaintiff’s personnel files and timekeeping and payroll documents;
- 19 • Key data points, including total number of employees, workweeks, and pay periods during
20 the relevant time period;
- 21 • Exemplars of the wage statements provided during the relevant time period;
- 22 • Job descriptions;
- 23 • Employee Handbooks; and
- 24 • An organizational chart.

25 This information coupled with the representative data sampling, enabled Plaintiff to extrapolate
26 to the entire class and aided in Plaintiff’s creation of a class-wide exposure model for all the claims at
27 issue, including unpaid wages and penalties potentially owed for alleged minimum and overtime wages,
28 and meal and rest period violations. Ultimately, this discovery allowed the parties to assess the merits

1 and value of Plaintiff's claims and Defendants' defenses thereto.

2 12. On May 23, 2024, a mediation was held with Katherine J. Edwards, Esq., a well-
3 respected wage and hour class action mediator. During mediation, the parties vigorously debated their
4 opposing legal positions, the likelihood of certification of Plaintiff's claims, and the legal basis for the
5 claims and defenses.

6 13. Plaintiff filed with the Court his Motion for Preliminary Approval, along with the
7 Settlement, on November 1, 2024. The Court ordered Plaintiff to include the fee splitting arrangement
8 in the Settlement Agreement, resulting in the Parties having to amend the settlement agreement. On
9 February 2, 2025, Plaintiff provided the court with a Supplemental Preliminary Approval Brief and
10 Amended Proposed Order. Subsequently on March 4, 2025, the Court granted preliminary approval of
11 the class action settlement, approving the Settlement. Attached hereto as **Exhibit A** is a true and
12 correct copy of the Order Granting Preliminary Approval.

13 14. There are 299 total Settlement Class members defined as: "All individuals whom
14 Defendants employed as non-exempt employees and who worked in California at any time during the
15 Class Period." The Class Period is the period from March 29, 2019 through March 4, 2025.

16 15. Aggrieved Employee is defined as "all individuals whom Defendants employed as non-
17 exempt employees and who worked in California at any time during the PAGA Period." The PAGA
18 Period is the period from March 29, 2022 through March 4, 2025.

19 16. Plaintiff's primary theory of liability is related to Defendants' alleged failure to pay
20 Settlement Class members for all time worked. Specifically, Plaintiff alleges Defendants recorded
21 their employees' scheduled hours and paid wages based thereon, not the actual start and stop work
22 times. Plaintiff also alleges that this time shaving and/or rounding practice utilized by Defendants was
23 not-even handed over time and would almost exclusively round and shave in Defendants' favor such
24 that the employees were routinely underpaid for their time worked.

25 17. Defendants contend that it compensated Settlement Class Members for all of their time
26 worked. Defendants also contend that their rounding practices were lawful, and any unpaid time was
27 *de minimis* (not near the 30 minutes per shift alleged by Plaintiff) and therefore non-compensable.
28

1 Defendants further assert that Plaintiff would be unable to certify a rounding class given the
2 individualized inquiries that would be required, and also that Defendants' rounding mechanism was,
3 according to them, allegedly facially neutral.

4 18. Plaintiff also alleges that he and Settlement Class Members were not provided with all
5 legally-compliant first meal periods beginning before the end of the fifth hour of work. Additionally,
6 Defendants failed to meet their obligation of recording the actual start and stop time for meal periods
7 and as such, there is a presumption that Plaintiff and Settlement Class members were not relieved of
8 duty and no lawful meal period was provided.

9 19. Defendants counter that they have always provided non-exempt employees with an
10 opportunity to take legally compliant meal periods, and any non-compliant meal periods reflected in
11 employee timekeeping records were solely the result of employee choice, rather than any policy or
12 practice of Defendants. Defendants point out that under *Brinker Restaurant Corp. v. Superior Court*
13 (2012) 53 Cal. 4th 1004, they are only required to "provide" the opportunity to take meal periods, not
14 "ensure" meal periods are taken, and that they have always done so. Finally, Defendants contend
15 Plaintiff's meal period claim is not suited for class certification, since individual inquiries would be
16 required to assess which employees took non-compliant meal periods, how many meal periods were
17 non-compliant or missed, and the reasons why a particular employee took a non-compliant meal period
18 or missed a meal period during a particular shift.

19 20. Plaintiff further alleges that he and Settlement Class members were also not authorized
20 and permitted to take all required rest periods due to Defendants' rest period policies and practices that
21 fail to authorize and permit all rest periods for every four hours worked, *or major fraction thereof*.
22 Specifically, Plaintiff alleges that due to work demands, he and Settlement Class members were not
23 authorized and permitted to take duty-free net 10 minute rest periods.

24 21. Defendants contend they have always maintained and enforced lawful rest period
25 policies and practices, and that Settlement Class Members were authorized and permitted to take all
26 off-duty rest periods in compliance with California law. Further, Defendants argue that Plaintiff's rest
27 period claim is inherently unsuited for class treatment as it requires an individualized inquiry into
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1 whether each Settlement Class Member was in fact authorized and permitted to take a compliant rest
2 period, which would devolve into an unmanageable series of mini-trials.

3 22. Plaintiff alleges that Defendants failed to reimburse him and Settlement Class Members
4 for all necessary business expenses incurred. Specifically, Defendants required Plaintiff and
5 Settlement Class Members to use their personal cellular phones, computers, and/or tools for work-
6 related purposes but did not reimburse the Settlement Class Members for such usage. Despite knowing
7 that Settlement Class Members had incurred necessary business expenses to communicate with team
8 members through their own personal electronic devices with internet access, Defendants failed to
9 reimburse putative class members in violation of Labor Code § 2802.

10 23. Defendants contend that employees did not have to use their personal electronic devices
11 to communicate with team members and would only do so at their own volition. Defendants also argue
12 that this claim is not suitable for class treatment because it would require individualized determinations
13 as to whether each employee used a personal cellular phone and/or devices, how often, and how much
14 of that use was a reasonable percentage of their individual monthly expenses.

15 24. Plaintiff alleges that Defendants issued inaccurate wage statements in violation of Labor
16 Code § 226 as a result of the alleged unpaid minimum wages, overtime wages, and meal and rest period
17 premium wages described above.

18 25. Defendants argue that their alleged wage statement violations could not be shown to
19 be “knowing and intentional,” and that Plaintiff cannot show that he or any other employee “suffer[ed]
20 injury” as a result of the alleged wage statement violations, as required by Lab. Code § 226(e) for
21 imposition of penalties.

22 26. Plaintiff alleges that as a result of failing to pay all wages and all meal and rest period
23 premium at the end of employment, Defendants are liable for waiting time penalties under Labor Code
24 § 203.

25 27. Defendants assert they have strong defenses to the waiting time claim because there
26 exist good-faith disputes as to Plaintiff’s underlying claims, precluding imposition of penalties.

27 28. Plaintiff also seeks civil penalties under the PAGA as a result of the foregoing alleged
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1 Labor Code violations.

2 29. Defendants argue that Plaintiff's PAGA claim will fail for the same reasons that his
3 underlying claims will fail. Defendants also maintain that, given their good faith defenses, this Court
4 would exercise its discretion to substantially reduce any PAGA penalties if it were to find Defendants
5 liable for any of Plaintiff's claims.

6 30. In my experience in wage and hour class action matters similar to this one, fee awards
7 generally average around one-third of the gross recovery.

8 31. My law firm's and co-counsel's work on this case includes, but is not limited to:
9 conducting pre-filing investigation, analyzing Plaintiff's claims, conducting legal research, reviewing
10 Defendants' documents and policies, analyzing timekeeping data and payroll records, creating a
11 comprehensive damages model, drafting a mediation brief, preparing for and attending mediation,
12 negotiating and preparing the long-form settlement agreement, preparing the Motions for Preliminary
13 and Final Approval, overseeing the settlement administration process, and otherwise litigating this
14 case.

15 32. Since undertaking representation of Plaintiff, my firm and/or co-counsel's firm
16 dedicated substantial resources to this litigation, including expending a total of \$21,193.84, in actual
17 costs, have devoted substantial time to this litigation and expect to incur approximately \$450.00 in
18 future costs for filing the instant motion, filing the final declaration regarding distribution of
19 settlement, Case Anywhere fees, service and messenger fees, postage fees, and costs for future
20 appearances. A true and correct copy of my firm's and Haines Law Group's costs summary in this
21 matter is attached hereto as **Exhibit B**.

22 33. My experience in matters similar to this one was integral in evaluating the strengths
23 and weaknesses of this case and the reasonableness of the Settlement. Practice in the narrow field of
24 wage and hour litigation requires skill and knowledge concerning the rapidly evolving substantive
25 state and federal law, as well as the procedural law of class action litigation. This case involved
26 nuanced legal issues including questions surrounding Defendants' obligation to "provide" meal
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periods, “authorize and permit” rest periods, and the propriety of statutory penalties, to name just a few.

34. Given the considerable potential for adverse outcomes in this case, including, but not limited to losing on class certification and/or merits issues, the contingent risk borne by Class Counsel was great. In addition to the legal and procedural challenges this lawsuit presented, there were also other practical challenges. There was a real risk that my firm and co-counsel’s firm would not be compensated for our work, because our firms handled this matter on a purely contingent basis. Thus, Plaintiff was not responsible for paying my firm’s attorneys’ fees and my firm could only recover attorneys’ fees if Plaintiff was successful. By the time I (or someone from my firm) attend the final approval hearing in this matter, my firm and co-counsel firm will have litigated this case for well over two years with no payment, all while bearing the risk of non-payment if Plaintiff was unsuccessful. Moreover, as discussed above, Class Counsel has advanced \$21,193.84 in litigation costs on a contingency basis, which also carried risk because Class Counsel would not recoup its costs in the event Plaintiff did not prevail in this lawsuit.

In this case, Class Counsel have a lodestar of \$220,202.50 which results in a multiplier of approximately 1.51 compared to the \$331,953.17 fee request. The following is a general summary showing the number of hours of work performed by each attorney and paralegal in my firm and co-counsel’s firm on this case:

Name	Rate	Hours	Pre-Multiplier Lodestar
Scott M. Lidman (27th Year Attorney)	\$900	108.5	\$97,650.00
Paul K. Haines (18th Year Attorney)	\$800	23.5	\$18,800.00
Milan Moore (9th Year Attorney)	\$650	117.8	\$76,570.00
Tiara Gose-Hardy (6th Year Attorney)	\$525	41.3	\$21,682.50
Paralegals	\$200	27.5	\$5,500.00
Total Lodestar			\$220,202.50

1 35. My proposed hourly rate of \$900, Mr. Haines' proposed hourly rate of \$800, Ms.
2 Moore's proposed hourly rate of \$650, and Ms. Gose-Hardy's proposed hourly rate of \$525 are
3 reasonable in light of our respective skills, wage and hour class action litigation experience, reputation,
4 and fee awards to other attorneys of similar experience in California. Moreover, our requested hourly
5 rates are in line with the *Laffey Matrix*, a true and correct copy of which is attached hereto as **Exhibit**
6 **C**.

7 36. The attorneys' fee award requested is consistent with those routinely awarded by
8 California superior courts. California superior courts frequently grant common fund awards of 33%.
9 *See, e.g., Ochoa v. Haralambos Beverage Co.*, No. BC319588 (Super. Ct., Los Angeles County, Feb.
10 1, 2007) (33.3% fee award with no mention of lodestar crosscheck); *Jones v. Alliance Imaging, Inc.*,
11 No. RG05210418 (Super. Ct., Alameda County, Nov. 27, 2006) (33% fee award with no mention of
12 lodestar crosscheck); *Wisniewski v. Pacific Maritime Assoc.*, No. BC293134 (Super. Ct., Los Angeles
13 County, Nov. 20, 2006) (30.7% fee award from \$12.9 million settlement with no mention of lodestar
14 crosscheck); *Garcia v. Save Mart Supermarkets*, No. 312026 (Super. Ct., Stanislaus County, Aug. 3,
15 2004) (33% fee award with no mention of lodestar crosscheck); *Terrell v. Ocean's 11 Casino, Inc.*,
16 No. GIC795732 (Super. Ct., San Diego County, Feb. 10, 2004) (approving 33% fee award); *Big Lots*
17 *Overtime Cases*, JCC Proceeding No. 4283, San Bernardino County Superior Court, Feb 4, 2004)
18 (approving a 33% fee recovery); *Tokar v. GEICO*, (San Diego Superior Court, No. GIC 810166, July
19 9, 2004) (approving award of 33-1/3%); *Davis v. The Money Store, Inc.*, (San Diego County Superior
20 Court, No. 99AS01716, December 26, 2000) (33-13% of the settlement).

21 37. Indeed, numerous courts have awarded attorneys' fees of up to, or in excess of 40% of
22 the common fund. *Ammari Electronics, et al. v. Pacific Bell Directory*, Alameda County Sup. Ct.,
23 Case No. RG05198014 (awarded 43.8%) (2015); *In re California Indirect Purchaser X Ray Film*
24 *Antitrust Litigation*, San Francisco Sup. Ct. 1998 (citing *Abzug v. Kerkorian*, Los Angeles Sup. Ct.,
25 Nov. 19, 1990, Case No. CA-00981 (45%) and *Haitz v. Meyer*, Alameda County Sup. Ct., August
26 20, 1990, Case No. 5729683 (45%)); *Hall v. Cinema 7, Inc.*, San Francisco Sup. Ct., July 16, 2008,
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28

Case No. CGC-01-409105 (53%); and *Rundberg v. Intrawest Napa Dev. Co.*, Napa County Sup. Ct., January 15, 2014, Case No. 26-56886 (40%).

38. Being a private law practice my firm can only properly litigate a limited number of cases at one time. The professional demands of this case were significant, including a significant number of hours of attorney and paralegal time. This litigation precluded my firm from other employment due to the time and financial commitments required by the case. Indeed, because my firm takes on cases on a purely contingency fee, we are only compensated for our time if we successfully settle a case or prevail at trial. Accordingly, I believe the requested fees are reasonable.

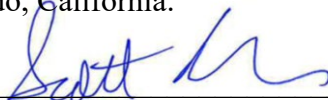
39. The requested enhancement payment to Plaintiff of \$7,500.00 is also reasonable given Plaintiff's efforts in this case and the risks she undertook on behalf of Settlement Class members. Plaintiff gathered documents for use in the lawsuit and attended several meetings with Class Counsel discussing the case, the merits, the defenses, and the overall fairness of the settlement reached. Thus, the enhancement payment to Plaintiff is appropriate and justified as part of the Settlement and should be finally approved.

40. Plaintiff submitted the Settlement and Motion for Preliminary Approval, Amended Class Action and PAGA Settlement Agreement and Class Notice, Supplemental Preliminary Approval Brief and Amended Proposed Order, and the Court's Amended Order Granting Preliminary Approval of the Settlement to the LWDA via the LWDA's website on November 1, 2024, February 4, 2025, June 26, 2025, and March 12, 2025, respectively. True and correct copies of the proofs of service are attached hereto as **Exhibits D-G, respectively**.

41. Plaintiff has provided written approval of the split of attorneys' fees in this action.

42. As the Response Deadline is June 30, 2025, Plaintiff will submit a supplemental declaration from the settlement administrator that includes the final Settlement Class Members' responses after the response deadline expires and prior to the hearing on July 21, 2025.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on June 26, 2025, at El Segundo, California.



Scott M. Lidman

EXHIBIT A

EXHIBIT A

FILED

Superior Court of California
County of Los Angeles

03/04/2025

David W. Stoyan, Executive Officer / Clerk of Court

By: A. Morales Deputy

LIDMAN LAW, APC

Scott M. Lidman (SBN 199433)

slidman@lidmanlaw.com

Milan Moore (SBN 308095)

mmoore@lidmanlaw.com

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Tel: (424) 322-4772

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Attorneys for Plaintiff

MATTHEW CRUZ

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

MATTHEW CRUZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

MATTHEW CRUZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

CAT SPEC, LTD. L.P., a Texas limited
partnership; STRONGHOLD, LTD.
LIMITED PARTNERSHIP, a Texas limited
partnership; and DOES 1 through 100,

Defendants.

Case No. 23STCV06904

*[Assigned for all purposes to Hon. Lawrence P.
Riff, Dept. SSC-7]*

**[AMENDED ~~PROPOSED~~] ORDER
GRANTING PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: February 27, 2025

Time: 10:00 a.m.

Dept.: SSC-7

1 The Motion of Plaintiff Matthew Cruz (“Plaintiff”) for Preliminary Approval of Class Action
2 Settlement came before this Court on February 27, 2025. The Court, having considered the proposed
3 Amended Class Action and PAGA Settlement Agreement and Class Notice (the “Settlement”), attached
4 as Exhibit A to the Supplemental Declaration of Scott M. Lidman filed concurrently with the Motion,
5 having considered Plaintiff’s Motion for Preliminary Approval of Class Action Settlement,
6 Memorandum of Points and Authorities in support thereof, and supporting declarations filed therewith;
7 and good cause appearing, HEREBY ORDERS THE FOLLOWING:

8 1. The Court GRANTS preliminary approval of the class action settlement as set forth in
9 the Settlement and finds its terms to be within the range of reasonableness of a settlement that ultimately
10 could be granted approval by the Court at a Final Fairness Hearing. For purposes of the Settlement,
11 the Court finds that the proposed Settlement Class is ascertainable and that there are a sufficiently well-
12 defined community of interest among the members of the Settlement Class in questions of law and fact.
13 Therefore, for settlement purposes only, the Court grants conditional certification of the following
14 Settlement Class:

15 All individuals whom Defendants employed as non-exempt employees and
16 who worked in California from March 29, 2019 through the date the court
preliminarily approves the Settlement. .

17 2. For purposes of the Settlement, the Court designates named Plaintiff Matthew Cruz as
18 Class Representative, and Scott M. Lidman and Milan Moore of Lidman Law, APC and Paul Haines of
19 Haines Law Group, APC as Class Counsel.

20 3. The Court designates Phoenix Class Action Administration Solutions as the third-party
21 Settlement Administrator for mailing notices.

22 4. The Court approves, as to form and content, the Amended Notice of Class Action
23 Settlement and Hearing Date for Final Court Approval (“Class Notice”) and is attached to the Amended
24 Settlement Agreement as Exhibit A.

25 5. The Court finds that the form of notice to the Settlement Class regarding the pendency of
26 the action and of the Settlement, and the methods of giving notice to members of the Settlement Class,
27 constitutes the best notice practicable under the circumstances, and constitute valid, due, and sufficient
28

notice to all members of the Settlement Class. The form and method of giving notice complies fully with the requirements of California Code of Civil Procedure section 382, California Civil Code section 1781, California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other applicable law.

6. The Court further approves the procedures for Settlement Class Members to opt out of or object to the Settlement, as set forth in the Class Notice.

7. The procedures and requirements for filing objections in connection with the Final Fairness Hearing are intended to ensure the efficient administration of justice and the orderly presentation of any Settlement Class Member's objection to the Settlement, in accordance with the due process rights of all Settlement Class Members.

8. The Court directs the Settlement Administrator to mail the Class Notice to the members of the Settlement Class in accordance with the terms of the Settlement.

9. The Class Notice shall provide at least 60 calendar days' notice for members of the Settlement Class to opt out of, or object to, the Settlement.

10. The Final Fairness Hearing on the question of whether the Settlement should be finally approved as fair, reasonable, and adequate is scheduled in Department 1 of this Court, located at 312 North Spring Street, Los Angeles, California, 90012 on July 21, 2025 at 10:00 a.m./p.m.

11. At the Final Fairness Hearing, the Court will consider: (a) whether the Settlement should be finally approved as fair, reasonable, and adequate for the Settlement Class; (b) whether a judgment granting final approval of the Settlement should be entered; and (c) whether Plaintiff's application for reasonable attorneys' fees, reimbursement of litigation expenses, service payment to Plaintiff, and payment to the Labor and Workforce Development Agency ("LWDA") for penalties under the Labor Code Private Attorneys General Act ("PAGA") should be granted.

12. Counsel for the parties shall file memoranda, declarations, or other statements and materials in support of their request for final approval of the Settlement, attorneys' fees, litigation expenses, Plaintiff's service award, settlement administration costs, and payment to the LWDA for PAGA penalties prior to the Final Fairness Hearing according to the time limits set by the Code of Civil

Procedure and the California Rules of Court.

13. An implementation schedule is below:

Event	Date
Defendant to provide Class Data to Settlement Administrator	20 calendar days after issuance of the preliminary approval order
Settlement Administrator to mail Notice Packets to Class Members	14 calendar days after receiving Class Information from Defendant
Deadline for Class Members to request exclusion from, submit disputes, or object to, the Settlement	60 calendar days after mailing of the Notice by the Settlement Administrator
Deadline for Plaintiff to file Motion for Final Approval of Class Action Settlement:	16 court days before Final Fairness Hearing
Final Fairness Hearing:	July 21 , 2025 at 10:00 a.m./p.m.

14. Pending the Final Fairness Hearing, all proceedings in this action, other than proceedings necessary to carry out or enforce the terms and conditions of the Settlement and this Order, are stayed.

15. Counsel for the parties are hereby authorized to utilize all reasonable procedures in connection with the administration of the Settlement which are not materially inconsistent with either this Order or the terms of the Settlement.

IT IS SO ORDERED.

Dated: March 4
July 21, 2025



Samantha Jessner / Judge

Honorable Lawrence P. Riff
Judge of the Superior Court

EXHIBIT B

EXHIBIT B

Expense Summary
Matthew Cruz v. CAT Spec, Ltd. L.P., et al.

EXPENSE	AMOUNT
Mediation Costs (including Plaintiff's portion of mediator expenses)	\$6,000.00
Expert Fees	\$10,600.00
Filing, Service, and Messenger Fees	\$4,485.53
Document Purchase Costs	\$5.00
Copying Costs	\$19.75
Research Fees	\$33.33
Postage Costs	\$50.23
Anticipated Costs for filing the Final Approval motion, court appearances, service fees, copying and postage	\$450.00
TOTAL:	\$21,643.84

EXHIBIT C

EXHIBIT C

LAFFEY MATRIX

[History](#)
[Case Law](#)
[See the Matrix](#)
[Contact us](#)
[Home](#)

			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389

6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $i_{\frac{1}{2}}$ Years Out of Law School $i_{\frac{1}{2}}$ is calculated from June 1 of each year, when most law students graduate. $i_{\frac{1}{2}}1-3$ " includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $i_{\frac{1}{2}}4-7$ " applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $i_{\frac{1}{2}}1-3$ " from June 1, 1996 until May 31, 1999, would move into tier $i_{\frac{1}{2}}4-7$ " on June 1, 1999, and tier $i_{\frac{1}{2}}8-10$ " on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT D

EXHIBIT D

From: [DIR PAGA Unit](#)
To: [Marlyn Ajanel](#)
Subject: Thank you for your Proposed Settlement Submission
Date: Friday, November 1, 2024 11:27:01 AM

11/01/2024 11:25:44 AM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

LIDMAN LAW, APC
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2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355

Attorneys for Plaintiff
MATTHEW CRUZ

Electronically FILED by
Superior Court of California,
County of Los Angeles
11/01/2024 11:48 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By J. Nunez, Deputy Clerk

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

MATTHEW CRUZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

CAT SPEC, LTD. L.P., a Texas limited
partnership; STRONGHOLD, LTD.
LIMITED PARTNERSHIP, a Texas limited
partnership; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 23STCV06904

*[Assigned for all purposes to the Hon. Lawrence
P. Riff, Dept. SSC-7]*

**PROOF OF SERVICE ON THE LWDA RE
PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 2155 Campus Drive, Suite 150, El Segundo, California 90245.

On November 1, 2024, I served the foregoing document(s) described as:

1. **Class Action and PAGA Settlement Agreement and Class Notice**
2. **Plaintiff's Notice of Motion and Motion for Preliminary Approval of Class Action Settlement; Memorandum of Points and Authorities in Support Thereof**
3. **Declaration of Scott M. Lidman in Support of Motion for Preliminary Approval of Class Action Settlement**
4. **Declaration of Milan Moore in Support of Motion for Preliminary Approval of Class Action Settlement**
5. **Declaration of Paul K. Haines in Support of Motion for Preliminary Approval of Class Action Settlement**
6. **Declaration of Plaintiff Matthew Cruz in Support of Approval of Class Action Settlement**
7. **Declaration of Jodey Lawrence of Phoenix Class Action Administration Solutions in Support of Plaintiff's Motion for Preliminary Approval**
8. **[Proposed] Order Granting Preliminary Approval of Class Action Settlement**

on the interested party(ies) in this action as follows:

Labor and Workforce Development Agency
1515 Clay Street, Ste. 801
Oakland, CA 94612
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

(BY ELECTRONIC TRANSMISSION) I caused a true and correct copy of the document(s) described above to be electronically transmitted to the Labor and Workforce Development Agency ("LWDA") by uploading them to the LWDA's online system, under LWDA Case No. LWDA-CM-945127-23.

[X] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 1, 2024, at El Segundo, California.



Marlyn Ajanel

EXHIBIT E

EXHIBIT E

From: [DIR PAGA Unit](#)
To: [Marlyn Ajanel](#)
Subject: Thank you for your Proposed Settlement Submission
Date: Tuesday, February 4, 2025 3:32:00 PM

02/04/2025 03:31:46 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

LIDMAN LAW, APC
Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
MATTHEW CRUZ

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
MATTHEW CRUZ

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

MATTHEW CRUZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

CAT SPEC, LTD. L.P., a Texas limited
partnership; STRONGHOLD, LTD.
LIMITED PARTNERSHIP, a Texas limited
partnership; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 23STCV06904

*[Assigned for all purposes to the Hon. Lawrence
P. Riff, Dept. SSC-7]*

PROOF OF SERVICE ON THE LWDA

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 2155 Campus Drive, Suite 150, El Segundo, California 90245.

On February 4, 2025 I served the foregoing document(s) described as:

1. Amended Class Action and PAGA Settlement Agreement and Class Notice

on the interested party(ies) in this action as follows:

Labor and Workforce Development Agency
1515 Clay Street, Ste. 801
Oakland, CA 94612
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

[X] (BY ELECTRONIC TRANSMISSION) I caused a true and correct copy of the document(s) described above to be electronically transmitted to the Labor and Workforce Development Agency ("LWDA") by uploading them to the LWDA's online system, under LWDA Case No. LWDA-CM-945127-23.

[X] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on February 4, 2025, at El Segundo, California.



Marlyn Ajanel

EXHIBIT F

EXHIBIT F

From: [DIR PAGA Unit](#)
To: [Marlyn Ajanel](#)
Subject: Thank you for your Proposed Settlement Submission
Date: Thursday, June 26, 2025 1:12:47 PM

06/26/2025 01:11:47 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

LIDMAN LAW, APC
Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
MATTHEW CRUZ

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
MATTHEW CRUZ

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

MATTHEW CRUZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

CAT SPEC, LTD. L.P., a Texas limited
partnership; STRONGHOLD, LTD.
LIMITED PARTNERSHIP, a Texas limited
partnership; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 23STCV06904

*[Assigned for all purposes to the Hon. Samantha
P. Jessner, Dept. SSC-7]*

**PROOF OF SERVICE ON THE LWDA RE:
PLAINTIFF'S SUPPLEMENTAL BRIEF IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 2155 Campus Drive, Suite 150, El Segundo, California 90245.

On June 26, 2025, I served the foregoing document(s) described as:

- 1. Plaintiff's Supplemental Brief in Support of Motion for Preliminary Approval of Class Action Settlement**
- 2. Supplemental Declaration of Scott M. Lidman in Support of Motion for Preliminary Approval of Class Action Settlement**
- 3. [Amended Proposed] Order Granting Preliminary Approval of Class Action Settlement**

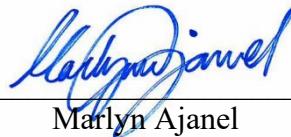
on the interested party(ies) in this action as follows:

Labor and Workforce Development Agency
1515 Clay Street, Ste. 801
Oakland, CA 94612
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

[X] (BY ELECTRONIC TRANSMISSION) I caused a true and correct copy of the document(s) described above to be electronically transmitted to the Labor and Workforce Development Agency ("LWDA") by uploading them to the LWDA's online system, under LWDA Case No. LWDA-CM-945127-23.

[X] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 26, 2025, at El Segundo, California.



Marlyn Ajanel

EXHIBIT G

EXHIBIT G

From: [DIR PAGA Unit](#)
To: [Marlyn Ajanel](#)
Subject: Thank you for your Court Order or Judgment Submission
Date: Wednesday, March 12, 2025 10:58:23 AM

03/12/2025 10:58:06 AM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Court Order or Judgment

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

LIDMAN LAW, APC
Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
2155 Campus Drive, Suite 150
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
MATTHEW CRUZ

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
MATTHEW CRUZ

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

MATTHEW CRUZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

CAT SPEC, LTD. L.P., a Texas limited
partnership; STRONGHOLD, LTD.
LIMITED PARTNERSHIP, a Texas limited
partnership; and DOES 1 through 100,
inclusive,

Defendants.

Case No.: 23STCV06904

*[Assigned for all purposes to the Hon. Samantha
P. Jessner, Dept. SSC-7]*

PROOF OF SERVICE ON THE LWDA

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 2155 Campus Drive, Suite 150, El Segundo, California 90245.

On March 12, 2025, I served the foregoing document(s) described as:

1. Order Granting Preliminary Approval of Class Action Settlement

on the interested party(ies) in this action as follows:

Labor and Workforce Development Agency
1515 Clay Street, Ste. 801
Oakland, CA 94612
<http://www.dir.ca.gov/Private-Attorneys-General-Act/Private-Attorneys-General-Act.html>

(BY ELECTRONIC TRANSMISSION) I caused a true and correct copy of the document(s) described above to be electronically transmitted to the Labor and Workforce Development Agency ("LWDA") by uploading them to the LWDA's online system, under LWDA Case No. LWDA-CM-945127-23.

[X] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 12, 2025, at El Segundo, California.



Marlyn Ajanel