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Attorneys for Plaintiff  
ALFREDO DURAN

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

ALFREDO DURAN, as an individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

SCOTT CONSTRUCTION SPECIALTIES,  
INC., a California corporation; and DOES 1  
through 100, inclusive,

Defendants.

Case No.: 23STCV05170

*[Assigned for all purposes to the Hon. Timothy  
Patrick Dillon, Dept. SSC-15]*

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

Date: October 15, 2026  
Time: 10:00 a.m.  
Dept.: SSC-15

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

2 1. I am an Associate with Lidman Law, APC, counsel for named plaintiff Alfredo Duran  
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 over seventy (70) active wage and hour class action lawsuits in state  
19 court.

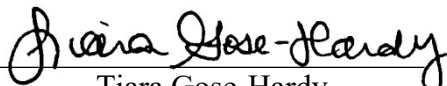
20 4. I have been appointed Class Counsel in *Jimenez v. Signtech Electrical Advertising, Inc.*,  
21 Case No. 37-2023-00038995-CU-OE-CTL, California Superior Court, County of San Diego,  
22 Honorable Judge James A. Mangione presiding; *Tapia v. Franco Whole Foods, LLC*, Case No. 37-  
23 2023-00046908-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Gregory  
24 W. Pollack presiding; *Mendoza-Hernandez v. Pacific Snow Valley Resort, LLC*, Case No.  
25 CIVSB2314151, California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz  
26 presiding; *Soto v. United Scaffold*, Case No. 37-2022-00042002-CU-OE-CTL, California Superior  
27 Court, County of San Diego, Honorable Michael T. Smyth presiding; *Belloso v. Hyatt Corporation*  
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1 *d.b.a. Hyatt Regency Huntington Beach*, Case No. 30-2023-01355826-CU-OE-CXC, California  
2 Superior Court, County of Orange, Honorable David A. Hoffer presiding; *Garcia v. Edris Plastics*  
3 *Mfg., Inc.*, Case No. 19STCV34700, California Superior Court, County of Los Angeles, Honorable  
4 William F. Highberger presiding; *Torres v. Coastal Building Services, Inc.*, Case No. 22STCV20308,  
5 California Superior Court, County of Los Angeles, Honorable Samantha P. Jessner presiding;  
6 *Anderson v. Kinder Morgan, Inc.*, Case No. 23STCV25789, California Superior Court, County of Los  
7 Angeles, Honorable Laura A. Seigle presiding; *Carrera v. Trail Lines, Inc.*, Case No. 23STCV23347,  
8 California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding; *Rodriguez v.*  
9 *Clinicas Del Camino Real, Inc.*, Case No. 2024CUOE020097, California Superior Court, County of  
10 Ventura, Honorable Charmaine Buehner presiding; *Ventura v. Braun Linen Service, Inc.*, Case No.  
11 24STCV23275, California Superior Court, County of Los Angeles, Honorable Samantha P. Jessner  
12 presiding.

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

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

18 Executed on September 22, 2026, at El Segundo, California.

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21 Tiara Gose-Hardy  
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