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Attorneys for Plaintiff
JAVIER MARTINEZ

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

JAVIER MARTINEZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SCHLAGE LOCK COMPANY, LLC, a
Delaware limited liability company, and
DOES 1 through 100, inclusive,

Defendants.

Case No.: CIVSB2218620

*[Assigned for all purposes to Hon. Joseph T.
Ortiz, Department S-17]*

**DECLARATION OF MILAN MOORE IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Date: September 6, 2023
Time: 8:30 a.m.
Dept.: S-17

1 I, MILAN MOORE, declare as follows:

2 1. I am an Associate with Lidman Law, APC, and counsel for the named Plaintiff
3 Javier Martinez (“Plaintiff”) and the proposed Settlement Class in the above-captioned matter. I
4 am a member in good standing of the bar of the State of California and am admitted to practice in
5 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 2015 graduate of UConn School of Law. I was admitted to the California
8 State Bar in December 2015 after passing the bar exam on my first attempt. Since that time, I have
9 practiced exclusively in the area of employment litigation. Prior to joining Lidman Law, APC, I
10 worked for an employment litigation boutique, where I successfully represented employees in
11 discrimination, harassment, retaliation and wrongful termination cases in both state and federal
12 court. While non-exhaustive, the type of work I performed included: conducting client intakes,
13 performing pre-filing research and analysis, drafting complaints, attending court hearings,
14 corresponding with opposing counsel, drafting and responding to written discovery, preparing for
15 and taking and defending depositions, drafting and opposing motions for remand, demurrers and
16 motions to strike, motions to compel, drafting mediation briefs, and attending mediations.

17 3. Since June 11, 2018, I have worked as an associate at my current firm, Lidman
18 Law, APC. I am currently staffed on approximately seventy (70) active wage and hour class action
19 lawsuits in both state and federal court.

20 4. I have been appointed Class Counsel in *Hanke v. C&W Facility Services, Inc.*, Case
21 No. CIVDS1814412, California Superior Court, County of San Bernardino, Honorable Judge
22 David Cohn presiding; *Molina v. Mader News, Inc.*, Case No. BC685960, California Superior
23 Court, County of Los Angeles, Honorable Judge Yvette M. Palazuelos presiding; *Alvarez v.*
24 *Salamander Fire Protection, Inc.*, Case No. BC688326, California Superior Court, County of Los
25 Angeles, Honorable Judge William F. Highberger presiding; *Fregoso v. Amerigas Propane, Inc.*,
26 Case No. BC697973, California Superior Court, County of Los Angeles, Honorable Rafael A.
27 Ongkeko presiding; *Teran v. Western Plastics, Inc.*, Case No. RIC1722619, California Superior
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1 Court, County of Riverside, Honorable Judge Sunshine Sykes presiding; *Villegas de Torres v. El*
2 *Monte Superstore Inc.*, Case No. BC688477, California Superior Court, County of Los Angeles,
3 Honorable Judge Daniel J. Buckley presiding; *Guzman v. Century Blinds*, Case No. RIC1723654,
4 California Superior Court, County of Riverside, Honorable Judge Sunshine S. Sykes presiding;
5 *George v. Convergence Marketing*, Case No. CIVDS1901039, California Superior Court, County
6 of San Bernardino, Honorable Judge David S. Cohn presiding; *Romero v. Fillmore Hospitality,*
7 *LLC*, Case No. BC705667, California Superior Court, County of Los Angeles, Honorable Judge
8 Maren E. Nelson presiding; *Davis v. WeDriveU*, Case No. 18CV322578, California Superior
9 Court, County of Santa Clara, Honorable Judge Brian C. Walsh presiding; *Acuna v. Canton Food*
10 *Co., Inc.*, Case No. BC685001, California Superior Court, County of Los Angeles, Honorable
11 Judge David S. Cunningham presiding; and *Contreras v. Worldwide Flight Services, Inc.*, Case
12 No. 2:18-cv-06036-PSG-SS, United States District Court for the Central District of California, the
13 Honorable Judge Philip S. Gutierrez presiding.

14 5. The details of the work completed in this case by me and the other attorneys in my
15 firm are set forth in the declaration of Scott M. Lidman filed concurrently herewith.

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

18 Executed on June 30, 2023 at El Segundo, California.

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22 Milan Moore
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