

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 Plaintiffs
DEON GENTRY and DEON GENTRY, JR.

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 Plaintiffs
DEON GENTRY and DEON GENTRY, JR.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

DEON GENTRY and DEON GENTRY, JR.,
as individuals and on behalf of all others
similarly situated,

Plaintiffs,

vs.

PINNACLE DRIVEAWAY, INC., a Wyoming
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. CIVSB2314325

*[Assigned for All Purposes to Hon. Jessica
Morgan, Dept. S-26]*

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

Date: January 10, 2025
Time: 9:00 a.m.
Dept.: S-26

1 **DECLARATION OF MILAN MOORE**

2 I, MILAN MOORE, declare as follows:

3 1. I am an Associate with Lidman Law, APC, counsel for named Plaintiffs Deon Gentry
4 and Deon Gentry, Jr. (collectively, “Plaintiffs”) in the above-captioned matter. I am a member in good
5 standing of the bar of the State of California and am admitted to practice in this Court. I have personal
6 knowledge of the facts stated in this declaration and could testify competently to them if called upon
7 to do so.

2. I am a 2015 graduate of UConn School of Law. I was admitted to the California State Bar in December 2015 after passing the bar exam on my first attempt. Since that time, I have practiced exclusively in the area of employment litigation. Prior to joining Lidman Law, APC, I worked for an employment litigation boutique, where I successfully represented employees in discrimination, harassment, retaliation and wrongful termination cases in both state and federal court. While non-exhaustive, the type of work I performed included: conducting client intakes, performing pre-filing research and analysis, drafting complaints, attending court hearings, corresponding with opposing counsel, drafting and responding to written discovery, preparing for and taking and defending depositions, drafting and opposing motions for remand, demurrers and motions to strike, motions to compel, drafting mediation briefs, and attending mediations.

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

21 4. I have been appointed Class Counsel in *Hanke v. C&W Facility Services, Inc.*, Case No.
22 CIVDS1814412, California Superior Court, County of San Bernardino, Honorable Judge David Cohn
23 presiding; *Molina v. Mader News, Inc.*, Case No. BC685960, California Superior Court, County of Los
24 Angeles, Honorable Judge Yvette M. Palazuelos presiding; *Alvarez v. Salamander Fire Protection,*
25 *Inc.*, Case No. BC688326, California Superior Court, County of Los Angeles, Honorable Judge
26 William F. Highberger presiding; *Fregoso v. Amerigas Propane, Inc.*, Case No. BC697973, California
27 Superior Court, County of Los Angeles, Honorable Rafael A. Ongkeko presiding; *Teran v. Western*

1 *Plastics, Inc.*, Case No. RIC1722619, California Superior Court, County of Riverside, Honorable Judge
2 Sunshine Sykes presiding; *Villegas de Torres v. El Monte Superstore Inc.*, Case No. BC688477,
3 California Superior Court, County of Los Angeles, Honorable Judge Daniel J. Buckley presiding;
4 *Guzman v. Century Blinds*, Case No. RIC1723654, California Superior Court, County of Riverside,
5 Honorable Judge Sunshine S. Sykes presiding; *George v. Convergence Marketing*, Case No.
6 CIVDS1901039, California Superior Court, County of San Bernardino, Honorable Judge David S.
7 Cohn presiding; *Romero v. Fillmore Hospitality, LLC*, Case No. BC705667, California Superior Court,
8 County of Los Angeles, Honorable Judge Maren E. Nelson presiding; *Davis v. WeDriveU*, Case No.
9 18CV322578, California Superior Court, County of Santa Clara, Honorable Judge Brian C. Walsh
10 presiding; *Acuna v. Canton Food Co., Inc.*, Case No. BC685001, California Superior Court, County of
11 Los Angeles, Honorable Judge David S. Cunningham presiding; and *Contreras v. Worldwide Flight*
12 *Services, Inc.*, Case No. 2:18-cv-06036-PSG-SS, United States District Court for the Central District
13 of California, the Honorable Judge Philip S. Gutierrez presiding.

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

17 I declare under penalty of perjury under the laws of the State of California that the foregoing is
18 true and correct. Executed on August 29, 2024, at El Segundo, California.

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Milan Moore