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DEON GENTRY, JR.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

DEANDRE PIERCE, on behalf of himself, all others similarly situated, and on behalf of the general public,

Plaintiff,

v.

QUALITY DRIVE AWAY, INC., an Indiana corporation; and DOES 1-100, inclusive,

Defendants.

DEON GENTRY and DEON GENTRY, JR., as individuals and on behalf of all other Aggrieved Employees,

Plaintiffs,

v.

QUALITY DRIVE AWAY, INC., an Indiana corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. CIVSB2313410
[Consolidated with Case. No. CIVSB2322025]

Assigned for all purposes to Hon. Joseph T. Ortiz, Dept. S17

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

Date: December 15, 2026
Time: 1:30 p.m.
Dept.: S-17

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DEON GENTRY, JR.

I, TIARA GOSE-HARDY, declare as follows:

1. I am an Associate with Lidman Law, APC, counsel for named Plaintiff Deon Gentry, Jr. ("Plaintiff Gentry, Jr.") and the proposed Settlement Class in the above-captioned matter. I am a member in good standing of the bar of the State of California and am admitted to practice in this Court. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I am a 2018 graduate of Whittier Law School. I was admitted to the California State Bar in December 2018 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 several employment litigation firms, 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, demurrers, motions to compel, drafting mediation briefs, and attending mediations.

3. Since July 8, 2024, I have worked as an Associate at my current firm, Lidman Law, APC. I am currently staffed on over eighty (80) active wage and hour class action lawsuits in state court.

4. I have been appointed Class Counsel in *Jimenez v. Signtech Electrical Advertising, Inc.*, Case No. 37-2023-00038995-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Judge James A. Mangione presiding; *Tapia v. Franco Whole Foods, LLC*, Case No. 37-2023-00046908-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Gregory W. Pollack presiding; *Mendoza-Hernandez v. Pacific Snow Valley Resort, LLC*, Case No. CIVSB2314151, California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz presiding; *Soto v. United Scaffold*, Case No. 37-2022-00042002-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Michael T. Smyth presiding; *Belloso v. Hyatt Corporation*

d.b.a. Hyatt Regency Huntington Beach, Case No. 30-2023-01355826-CU-OE-CXC, California Superior Court, County of Orange, Honorable David A. Hoffer presiding; *Garcia v. Edris Plastics Mfg., Inc.*, Case No. 19STCV34700, California Superior Court, County of Los Angeles, Honorable William F. Highberger presiding; *Torres v. Coastal Building Services, Inc.*, Case No. 22STCV20308, California Superior Court, County of Los Angeles, Honorable Samantha P. Jessner presiding; *Anderson v. Kinder Morgan, Inc.*, Case No. 23STCV25789, California Superior Court, County of Los Angeles, Honorable Laura A. Seigle presiding; *Carrera v. Trail Lines, Inc.*, Case No. 23STCV23347, California Superior Court, County of Los Angeles, Honorable Elihu M. Berle presiding; *Rodriguez v. Clinicas Del Camino Real, Inc.*, Case No. 2024CUOE020097, California Superior Court, County of Ventura, Honorable Charmaine Buehner presiding; *Ventura v. Braun Linen Service, Inc.*, Case No. 24STCV23275, California Superior Court, County of Los Angeles, Honorable Samantha P. Jessner presiding.

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

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

Executed on November 19, 2026, at El Segundo, California.



Tiara Gose-Hardy