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

VENANCIO CARRERA, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

TRAIL LINES, INC., a California corporation;
and DOES 1 through 100, inclusive,

Defendants.

Case No.: 23STCV23347

*[Assigned for all purposes to the Hon. Elihu M.
Berle, Dept. SSC-6]*

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

Date: April 6, 2026
Time: 10:00 a.m.
Dept.: SSC-6

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

2 1. I am an Associate with Lidman Law, APC, counsel for named Plaintiff Venancio
3 Carrera (“Plaintiff”) and the proposed Settlement Class in the above-captioned matter. I am a member
4 in good standing of the bar of the State of California and am admitted to practice in this Court. I have
5 personal knowledge of the facts stated in this declaration and could testify competently to them if called
6 upon 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 approximately ninety (90) active wage and hour class action lawsuits
19 in state 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.

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 February 5, 2026, at El Segundo, California.

Tiara Gose-Hardy