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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

ANA RODRIGUEZ TAPIA, as an individual
and on behalf of all others similarly situated,

Plaintiff,

vs.

FRANCO WHOLE FOODS, LLC, a California
limited liability company; and DOES 1 through
100, inclusive,

Defendants.

Case No. 37-2023-00046908-CU-OE-CTL

*[Assigned for all purposes to the Hon.
Gregory W. Pollack, Dept. C-71]*

**DECLARATION OF TIARA GOSE-
HARDY IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS
REPRESENTATIVE'S SERVICE
AWARD, AND ATTORNEYS' FEES
AND COSTS**

Date: October 10, 2025
Time: 9:30 a.m.
Dept.: C-71

Complaint Filed: October 27, 2023

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

2 1. I am an Associate with Lidman Law, APC, counsel for named Plaintiff Ana Rodriguez
3 Tapia (“Plaintiff”) and the proposed Settlement Class in the above-captioned matter. I am a member in
4 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 several
10 employment litigation firms, where I successfully represented employees in discrimination, harassment,
11 retaliation and wrongful termination cases in both state and federal court. While non-exhaustive, the type
12 of work I performed included: conducting client intakes, performing pre-filing research and analysis,
13 drafting complaints, attending court hearings, corresponding with opposing counsel, drafting and
14 responding to written discovery, preparing for and taking and defending depositions, drafting and
15 opposing motions, demurrers, motions to compel, drafting mediation briefs, and attending mediations.

16 3. Since July 8, 2024, I have worked as an associate at my current firm, Lidman Law, APC.
17 I am currently staffed on approximately seventy (70) active wage and hour class action lawsuits in state
18 court.

19 4. I have been appointed Class Counsel in *Jimenez v. Signtech Electrical Advertising, Inc.*,
20 Case No. 37-2023-00038995-CU-OE-CTL, California Superior Court, County of San Diego, Honorable
21 Judge James A. Mangione presiding.

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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 by 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 September 17, 2025, at El Segundo, California.

Tiara Gose-Hardy
Tiara Gose-Hardy