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Attorneys for Plaintiff
CATHERINE ANDERSON and the Proposed Class

[Additional counsel listed on following page]

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

CATHERINE ANDERSON, as an individual
and on behalf of all others similarly situated;
JOSE RODRIGUEZ, as an individual on
behalf of himself and all other similarly
situated,

Plaintiffs,

vs.

KINDER MORGAN, INC., a Delaware
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 23STCV25789

*[Assigned for all purposes to the Hon. Laura A.
Seigle, Dept. SSC-17]*

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

Date:
Time:
Dept.: SSC-17

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Attorneys for Plaintiff
JOSE RODRIGUEZ and the Proposed Class

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

2 1. I am an Associate with Lidman Law, APC, counsel for named Plaintiffs Catherine
3 Anderson and Jose Rodriguez (“Plaintiff”) and the proposed Settlement Class in the above-captioned
4 matter. I am a member in good standing of the bar of the State of California and am admitted to practice
5 in 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 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.

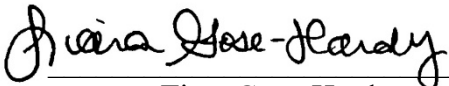
17 3. Since July 8, 2024, I have worked as an Associate at my current firm, Lidman Law,
18 APC. I am currently staffed on approximately ninety (90) active wage and hour class action lawsuits
19 in state court.

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.

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

26 I declare under penalty of perjury under the laws of the State of California that the foregoing is
27 true and correct.
28

Executed on October 22, 2025, at El Segundo, California.



Tiara Gose-Hardy