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Attorneys for Plaintiff
BLANCA E. BELLOSO

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

BLANCA E. BELLOSO, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

HYATT CORPORATION d.b.a. HYATT
REGENCY HUNTINGTON BEACH, a
Delaware corporation; and DOES 1 through
100,

Defendants.

Case No. 30-2023-01355826-CU-OE-CXC

*[Assigned for all purposes to the Hon. David A.
Hoffer, Dept. CX103]*

**SUPPLEMENTAL DECLARATION OF
SCOTT M. LIDMAN IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: April 27, 2026
Time: 1:30 p.m.
Dept.: CX103

Action Filed: October 11, 2023
Trial Date: None Set

1 I, SCOTT M. LIDMAN, declare as follows:

2 1. I am a shareholder and principal of the law firm Lidman Law, APC, and counsel for the
3 named Plaintiff Blanca E. Belloso (“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. On January 26, 2026, issued a Minute Order detailing the issues that need to be addressed
8 in subsequent briefing.

9 3. The number of aggrieved employees stated at the preliminary approval stage was based
10 on Defendant Hyatt Corporations dba Hyatt Regency Huntington Beach’s (“Defendant”) estimate of
11 aggrieved employees from the beginning of the relevant time period through February 2024. After the
12 Class Data was delivered to the Settlement Administrator and thoroughly reviewed, 754 individuals were
13 identified as Aggrieved Employees. While there was an increase in the number of Aggrieved Employees,
14 the increase has no major impact on the Settlement Agreement as a whole.

15 4. All Parties agree to an attorneys’ fee award of one-third (33%) of the gross settlement
16 amount. This is exhibited in various documents, including the fully executed Settlement Agreement.
17 Further, Class Counsel has spent well over two years litigating this lawsuit. The action was filed on
18 October 11, 2023 in the instant court. The lawsuit was removed to federal court where Class Counsel
19 prepared initial disclosures, drafted discovery requests, responded to discovery requests, prepared Plaintiff
20 for her deposition, deposed Defendant’s person most qualified, called and spoke to putative class
21 members, and prepared a motion for class certification. Class Counsel prepared for and attended
22 mediation and negotiated the Settlement Agreement. The lawsuit was remanded and since the execution
23 of the Settlement Agreement, Class Counsel has had to continue to spend considerable time on the matter,
24 e.g., prepare preliminary approval papers, amendments to the settlement agreement and a supplemental
25 brief, communicate with the Settlement Administrator and Class Members, and prepare final approval
26 papers and the instant supplemental brief. Attached as **Exhibit A** is a true and correct copy of the billing
27 records of Class Counsel.
28

5. No Class Member has objected to any part of the Settlement, including attorneys' fees.

6. Haines Law Group, APC is to receive 46.5%, Lidman Law, APC is to receive 31%, and Michael Burgis & Associates, PC is to receive 22.5% of the attorneys' fees award.

7. As stated in Plaintiff's previously filed declaration, in addition to providing Class Counsel with substantial factual information and documents and attending multiple conferences with Class Counsel to discuss the claims and theories at issue in litigation, Plaintiff prepared and sat for a full day of deposition. Plaintiff also took on the stigma associated with being a named plaintiff in a public lawsuit against an employer. Plaintiff was aware that the lawsuit had the potential to affect future employment opportunities and understood that she could be liable for Defendant's costs if she lost the case. Nonetheless, Plaintiff accepted the risks and pursued the lawsuit against her former employer, resulting in a settlement for the Settlement Class.

8. Plaintiff will provide the LWDA with a copy of the supplemental briefing after it is filed and will file a supplemental proof of service prior to the hearing.

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

Executed on April 3, 2026, at El Segundo, California.

Scott M. Lidman

EXHIBIT A

EXHIBIT A

Lidman Law, APC and Haines Law Group, APC

Billing Summary¹

Blanca Belloso v. Hyatt Corporation dba Hyatt Regency Huntington Beach

Activity	Billing Initials/Hrs/Rate	Amount
1 Initial case research; client intake interviews; review of personnel file payroll records, and other client documents; and new client onboarding.	SML 1.5 hrs @ \$900/hr PKH 1.2 hrs @ \$800/hr MM 1.7 hrs @ \$650/hr Paral. 0.3 hrs @ \$200/hr	\$3,475.00
2 Legal research regarding claims and drafting class action complaint and LWDA letter.	SML .7 hrs @ \$900/hr MM 2.3 hrs @ \$650/hr Paral. 0.4 hrs @\$200/hr	\$2,205.00
3 Receive and review Defendant's Answer and Notice of Removal.	SML 0.8 hrs @ \$900/hr MM 0.3 hrs @ \$650/hr Paral. 0.1 hrs @\$200/hr	\$935.00
4 Prepare and file PAGA Complaint; PAGA case management.	SML 4.7 hrs @ \$900/hr MM 0.3 hrs @\$650/hr Paral. 0.7 hrs @\$200/hr	\$4,565.00
5 Draft Initial Disclosures and review Defendant's Initial Disclosures.	SML 1.7 hrs @ \$900/hr MM 1.6 hrs @\$650/hr Paral. 0.1 hrs @\$200/hr	\$2,590.00
6 Prepare and propound one set of written discovery, including Special Interrogatories and Requests for Production of Documents.	SML 0.8 hrs @ \$900/hr MM 3.1 hrs @ \$650/hr Paral. 0.8 hrs @\$200/hr	\$1,465.00
7 Draft responses to first set of written discovery from Defendant, including Requests for Production of Documents; analyze documents for same; and telephone conferences with client re same	SML 1.0 hrs @ \$900/hr MM 3.1 hrs @ \$650/hr Paral. 0.9 hrs @\$200/hr	\$3,095.00
8 Review Notice of Deposition of Plaintiff; appear for deposition of	SML 3.4 hrs @ \$900/hr MM 16.4 hrs @ \$650/hr	\$13,740.00

¹ This billing summary does not include time spent on the instant supplemental brief in support of Final Approval.

Plaintiff; prepare for deposition of Defendant's Person Most Knowledgeable; appear for deposition of Defendant's Person Most Knowledgeable.	Paral. 0.1 hrs @\$200/hr	
9 Draft and participate in mailing of Belaire-West privacy notice; draft class contact letter and send.	SML 0.3 hrs @ \$900/hr MM 2.4 hrs @ \$650/hr Paral. 1.7 hrs @\$200/hr	\$2,170.00
10 Prepare class certification motion, including legal research, drafting motion, contacting putative class members, and preparing declarations in support thereof.	SML 2.7 hrs @\$900/hr MM 18.7 hrs @\$650/hr TGH 12.6 hrs @\$525/hr Paral. 7.7 hrs @ \$200/hr	\$22,740.00
11 Receive and review Defendant's discovery responses and corresponding document production of over 500 pages.	SML 2.7 hrs @\$900/hr MM 3.5 hrs @\$650/hr Paral. 0.1 hrs @ \$200/hr	\$4,725.00
12 Meeting and conferring with defense counsel regarding case and mediation; conducting detailed review and analysis of timekeeping and payroll records; review policies and procedures; reviewing and organizing mediation data production; preparing exposure analysis of claims for unpaid time, miscalculation of regular rate, and statutory penalties; legal research and analysis re claims; drafting, revising and finalizing mediation brief; and communications with client re mediation.	SML 9.3 hrs @\$900/hr MM 2.6 hrs @\$650/hr TGH 0.2 hrs @\$525/hr Paral. 0.3 hrs @ \$200/hr	\$10,225.00
13 Attending mediation with Phillip Cha.	SML 6.5 hrs @ \$900/hr PKH 3.3 hrs @\$800/hr MM 6.5 hrs @\$650/hr TGH 6.5 hrs @\$525/hr	\$16,127.50

14 Negotiating, drafting, and revising long-form settlement agreements and Notice Packet (which consists of (i) <i>Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval</i>; (ii) <i>Workweek Dispute & Change of Address Form</i>; (iii) <i>Request for Exclusion Form</i>; and (iv) <i>Objection Form</i>); exchanging multiple drafts of the long form agreement and notice packet documents with defense counsel; and multiple communications with defense counsel re the same; and communications with client re same.	SML 5.8 hrs @ \$900/hr MM 0.5 hrs @\$650/hr TGH 0.3 hrs @\$525/hr	\$5,702.50
15 Drafting misc. stipulations, joint reports, requests to continue, and notices, including Notice of Settlement and Notice of Rulings; and communications with defense counsel and exchanging drafts of same with defense counsel.	SML 2.2 hrs @ \$900/hr MM 3.2 hrs @\$650/hr TGH 2.1hrs @\$525/hr Paral. 1.2 hrs @ \$200/hr	\$5,402.50
16 Drafting, revising, and filing preliminary approval motion and supporting documents, including client declaration, attorneys' declaration and settlement administrator's declaration; drafting amendments to settlement agreement and revising notice packet; conferring with defense counsel; and drafting and filing supplemental brief and	SML 2.4 hrs @ \$900/hr PKH 1.4 hrs @ \$800/hr MM 6.2 hrs @ \$650/hr TGH 0.7 hrs @ \$525/hr Paral. 0.9 hrs @ \$200/hr	\$7,857.50

amended proposed order granting preliminary approval.		
17 Correspondence with Settlement Administrator re settlement and after preliminary approval was granted; review and approval mailing of Notice Packets; review weekly correspondence from Settlement Administrator re: opt outs, disputes, and objections and communicate with Settlement Administrator and defense counsel re approved communications with settlement class members	SML 1.2 hrs @ \$900/hr MM 1.1 hrs @\$650/hr TGH 1.7 hrs @\$525/hr Paral. 0.3 hrs @\$200/hr	\$2,747.50
18 Drafting final approval motion and supporting documents, including attorneys' declarations and settlement administrator's declaration.	SML 2.5 hrs @ \$900/hr PKH 1.6 hrs @\$800/hr MM 0.8 hrs @\$650/hr TGH 10.3 hrs @\$525/hr Paral. 0.9 hrs @\$200/hr	\$9,637.50
19 Appearing for hearings and travel time.	SML 11.5 hrs @\$900/hr MM 3.5 hrs @\$650/hr TGH 1.0 hrs @\$525/hr	\$13,150.00
20 Misc. meetings between co-counsel re: case status, updates, strategy, mediation, preliminary approval motion, and final approval motion.	SML 8.1 hrs @ \$900/hr PKH 4.7 hrs @\$800/hr MM 5.1 hrs @\$650/hr TGH 0.6 hrs @\$525/hr	\$14,680.00
TOTAL:		\$147,235.00