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Attorneys for Plaintiff
JOSE VALDIVIA

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

JOSE VALDIVIA, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

PADILLA CONSTRUCTION COMPANY, a
California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No.: 37-2024-00016674-CU-OE-CTL

*[Assigned for all purposes to the Hon. Loren G.
Freestone, Dept. C-64]*

**DECLARATION OF TIARA GOSE-
HARDY IN SUPPORT OF PLAINTIFF'S
MOTION FOR SETTLEMENT
APPROVAL OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT AND REASONABLE
ATTORNEYS' FEES, COSTS, AND
ENHANCEMENT AWARD**

Date: March 27, 2026
Time: 10:30 a.m.
Dept.: C-64

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

2 1. I am an Associate with Lidman Law, APC, counsel for named Plaintiff Jose Valdivia
3 (“Plaintiff”) and the proposed Aggrieved Employees 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.

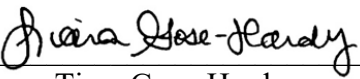
7 2. I am a 2018 graduate of Whittier Law School. I was admitted to the California State Bar
8 in December 2018 after passing the bar exam on my first attempt. Since that time, I have practiced
9 exclusively in the area of employment litigation. Prior to joining Lidman Law, APC, I worked for
10 several 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 seventy (70) active wage and hour class action lawsuits
19 in state court.

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

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

25 Executed on July 31, 2025, at El Segundo, California.

26
27 
28 Tiara Gose-Hardy