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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

STEPHEN ARMAS and JOSE ISRAEL
JERONIMO BRAN, as individuals and on
behalf of others similarly situated and the State
of California under the Private Attorneys
General Act,

Plaintiffs,

vs.

JJ&S ASBESTOS REMOVAL, INC., and
DOES 1 through 50, inclusive,

Defendants.

Case No. 24CU000405C

*[Assigned for All Purposes to Hon. Blaine K.
Bowman, Dept. C-74]*

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

Date: October 2, 2026
Time: 8:30 a.m.
Dept.: C-74

HAINES LAW GROUP, APC

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Attorneys for Plaintiff

STEPHEN ARMAS

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 Josue Israel Jeronimo Bran ("Plaintiff") and the proposed Settlement Class in the above-
4 captioned matter. I am a member in good standing of the bar of the State of California and am admitted
5 to practice in this Court. I have personal knowledge of the facts stated in this declaration and could
6 testify competently to them if called upon to do so.

7 2. I am a 1998 graduate of Santa Clara University School of Law, where I graduated *summa*
8 *cum laude*. During law school, I worked as a summer associate for the international employment law
9 firm of Littler Mendelson, P.C., located in Los Angeles, California.

10 3. Since graduating from law school, my practice has focused exclusively on employment
11 litigation. In September 1998, I began working as an associate attorney at the international law firm of
12 Littler Mendelson P.C., at its Los Angeles office, which according to its website is the largest law firm
13 in the world exclusively devoted to representing management in employment, employee benefits and
14 labor law matters.

15 4. In 2000, I left Littler Mendelson to work at the Los Angeles office of Jones Day, which
16 was at the time one of the largest international firms in the world. During my employment at Jones
17 Day, I worked exclusively in the labor and employment department. In or around 2003, I went to work
18 at the law firm of Loeb & Loeb, again working exclusively in the Labor & Employment department. In
19 2008, I returned to Littler Mendelson, was promoted to Shareholder in 2009, and from 2008 until the
20 end of 2017, I practiced exclusively labor and employment law, with a strong emphasis and most of my
21 time working on wage and hour class actions venued in both state and federal courts. During that time
22 and my legal career in general, I also worked on a number of single and multi-plaintiff wage and hour
23 matters as well.

24 5. During my employment at Littler Mendelson, I played a significant role in the class
25 actions that I was staffed on, and ran many on my own both as an Of Counsel and as a Shareholder. In
26 particular, I received a wide-array of wage and hour class action experience performing the following
27 types of tasks: drafting demurrers, motions to strike and/or dismiss; removing actions from state court
28

1 to federal court; drafting and responding to written discovery; drafting and opposing discovery related
2 motions; arguing discovery related motions; drafting motions to consolidate related matters;
3 interviewing putative class members and obtaining declarations in connection with class certification;
4 drafting oppositions to motions for class certification; drafting motions for decertification following
5 class certification; conducting exposure analyses to assess the strengths and weaknesses of asserted
6 claims, the likelihood of prevailing at class certification and potential damages resulting from such
7 claims; drafting mediation briefs; serving as the primary contact to in-house counsel; deposing named
8 plaintiffs and putative class members; deposing retained expert witnesses; and defending the depositions
9 of corporate witnesses. I also was involved in the negotiations and settlements of many large wage and
10 hour class actions. In short, I played an integral role in all aspects of litigation from the inception of a
11 matter through and beyond class certification. I also supervised the work of several junior attorneys
12 who were staffed on the same wage and hour class actions.

13 6. Although not exhaustive, below is a list of many of the wage and hour class and PAGA
14 actions that I performed substantial work on while I was a shareholder at Littler Mendelson:

- 15 ► *Ortega v. J.B. Hunt Transport, Inc.*, Case No. 07-cv-8336-RGK-AFMx, United
16 States District Court, Central District of California, Honorable Gary Klausner,
17 presiding¹.
- 18 ► *Aceves v. J.B. Hunt Transport, Inc.*, Case No. CIVDS1306133, California
19 Superior Court, County of San Bernardino, Honorable Michael Sachs, presiding.
- 20 ► *Moreno v. J.B. Hunt Transport, Inc.*, Case No. BC388612, California Superior
21 Court, County of Los Angeles, Honorable Mel Red Recana, presiding.
- 22 ► *Newcomb v. J.B. Hunt Transport, Inc.*, Case No. RG16815734, California
23 Superior Court, County of Alameda, Honorable Winifred Smith, presiding.
- 24 ► *Vaquero v. Stoneledge Furniture, LLC, et al.*, Case No. 12-cv-08590-PA-MAN,
25 United States District Court, Central District of California, Honorable Percy
26 Anderson, presiding.

27
28 ¹ My work on this matter including proceedings not only in District Court, but also work before the United States Court of Appeals for the Ninth Circuit as well as the United States Supreme Court.

- 1 ▶ *Vaquero v. Stoneledge Furniture, LLC, et al.*, Case No. BC388612, California
2 Superior Court, County of Los Angeles, Honorable Elihu Berle, presiding.²
- 3 ▶ *Dugan v. Stoneledge Furniture, LLC*, Case No. 16-cv-01125-PA-FFMx, United
4 States District Court, Central District of California, Honorable Percy Anderson,
5 presiding.
- 6 ▶ *Klune v. Stoneledge Furniture, LLC*, Case No. 14-cv-03986-PA-FFMx, United
7 States District Court, Central District of California, Honorable Percy Anderson,
8 presiding.
- 9 ▶ *Diaz v. ABM Industries, Inc.; Ampco Parking*, Case No. BC362932, California
10 Superior Court, County of Los Angeles, Honorable Jane Johnson, presiding.³
- 11 ▶ *Adams v. Luxottica Retail North America, Inc.*, Case No. 07CC01346, California
12 Superior Court, County of Orange, Honorable Thierry Patrick Colaw, presiding.
- 13 ▶ *Sakkab v. Luxottica Retail North America, Inc.*, Case No. 12-cv-00436-GPC-
14 KSC, United States District Court, Southern District of California.⁴
- 15 ▶ *Page v. Oakley, Inc.*, Case No. FCS041512, California Superior Court, County
16 of Solano, Honorable Paul Berman, presiding.
- 17 ▶ *Ramirez v. Oakley, Inc.*, Case No. 30-2014-00731617-CU-OE-CJC California
18 Superior Court, County of Orange, Honorable William Claster, presiding.
- 19 ▶ *Ramirez v. Oakley, Inc.*, Case No. 30-2014-00723846-CU-DE-CXC, California
20 Superior Court, County of Orange, Honorable William Claster, presiding.
- 21 ▶ *Sierra v. Oakley, Inc.*, Case No. 13-cv-00319-AG-JPR, United States District
22 Court, Central District of California, Honorable Andrew Guilford, presiding.⁵
- 23
- 24
- 25

26 ² My work on this matter included proceedings not only in the trial court, but also before the California Courts of Appeal
27 and the California Supreme Court.

28 ³ This matter was consolidated and litigated collectively with Case Nos. BC380923, BC 381523 and BC 406663.

⁴ The work I performed on this case included work in the United States Court of Appeals for the Ninth Circuit.

⁵ The work I performed on this case included work in the United States Court of Appeals for the Ninth Circuit.

- 1 ▶ *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United
2 States District Court, Central District of California, Honorable Margaret Morrow,
3 presiding.
- 4 ▶ *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United
5 States District Court, Central District of California, Honorable Margaret Morrow,
6 presiding.
- 7 ▶ *Khelghatian v. Comerica Bank, et al.*, Case No. 11-cv-7689-DSF-FFMx, United
8 States District Court, Southern District of California, Honorable John A.
9 Houston, presiding.
- 10 ▶ *Babasa v. Comerica Bank, et al.*, Case No. 11-cv-0595-JAH-BGS, United States
11 District Court, Central District of California, Honorable Margaret Morrow,
12 presiding.
- 13 ▶ *Bernal v. Comerica Bank, et al.*, Case No. 11-cv-01298-JAH-BGS, United States
14 District Court, Central District of California, Honorable Margaret Morrow,
15 presiding.
- 16 ▶ *Khalili v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx, United
17 States District Court, Northern District of California.
- 18 ▶ *Granata v. Comerica Bank, et al.*, Case No. 37-2011-00086316-CU-OE-CTL,
19 California Superior Court, County of San Diego, Honorable Jeffrey B. Barton,
20 presiding.
- 21 ▶ *Mathews v. Comerica Bank, et al.*, Case No. 111CV194781, California Superior
22 Court, County of Santa Clara.
- 23 ▶ *Gallegos v. Comerica Bank, et al.*, Case No. BC455515, California Superior
24 Court, County of Los Angeles, Honorable Terry Green, presiding.
- 25 ▶ *Rumohr v. Comerica Bank, et al.*, Case No. CGC-11-508433, California Superior
26 Court, County of San Francisco.

1 ► *Smith v. Werner Enterprises*, Case No. 15-cv-02978-RS, United States District
2 Court, Northern District of California, Honorable Richard Seeborg, presiding.

3 7. In January 2018, I voluntarily resigned from Littler Mendelson in order to open my own
4 law firm, Lidman Law, APC, to represent employees with work-related claims, including primarily
5 wage and hour claims and almost exclusively on a class-action basis. I am the President and Shareholder
6 of Lidman Law. Currently, over ninety percent (90%) of my practice is dedicated exclusively to the
7 prosecution of wage and hour class actions, and I am currently responsible for prosecuting over sixty-
8 five (65) wage and hour class actions filed in State courts throughout California, with several of them
9 having been removed to Federal courts. I believe that my professional experience renders me more than
10 qualified to serve as class counsel in this lawsuit involving claims of underpaid overtime and minimum
11 wages, meal and rest period violations, and derivative penalty claims. Not only have I litigated dozens
12 of wage and hour cases throughout my career involving similar claims, including the wage and hour
13 class actions identified above, I have litigated similar claims from both plaintiff and defense
14 perspectives. As a result, I am able to realistically assess and evaluate the facts and legal arguments
15 that can be made in pursuit and defense of similar wage and hour claims, as well as those facts and
16 arguments in support and in opposition to class certification. Consequently, I am able to appreciate the
17 significant risks, uncertainties, and delay involved in wage and hour class action litigation.

18 8. I have been appointed Class Counsel in: *Guardado v. Wesley Allen, Inc.*, Case No.
19 BC683027, California Superior Court, County of Los Angeles, Honorable Judge Carolyn B. Kuhl
20 presiding; *Rodriguez v. Satco, Inc.*, Case No. BC682137, California Superior Court, County of Los
21 Angeles, Honorable Judge Ann I. Jones presiding; *Ong v. Howard's Appliances, Inc.*, Case No. 30-
22 2017-00964213-CU-OE-CXC, California Superior Court, County of Orange, Honorable Judge
23 William Claster presiding; *Hanke v. C&W Facility Services, Inc.*, Case No. CIVDS1814412,
24 California Superior Court, County of San Bernardino, Honorable Judge David Cohn presiding; *Molina*
25 *v. Mader News, Inc.*, Case No. BC685960, California Superior Court, County of Los Angeles,
26 Honorable Judge Yvette M. Palazuelos presiding; *Alvarez v. Salamander Fire Protection, Inc.*, Case
27 No. BC688326, California Superior Court, County of Los Angeles, Honorable Judge William F.

1 Highberger presiding; *Rodriguez v. H.F. Cox, Inc.*, Case No. BC653164, California Superior Court,
2 County of Los Angeles, Honorable Judge Carolyn B. Kuhl presiding; *Fregoso v. Amerigas Propane,*
3 *Inc.*, Case No. BC697973, California Superior Court, County of Los Angeles, Honorable Judge Rafael
4 A. Ongkeko presiding; *Teran v. Western Plastics, Inc.*, Case No. RIC1722619, California Superior
5 Court, County of Riverside, Honorable Judge Sunshine Sykes presiding; *Villegas de Torres v. El*
6 *Monte Superstore Inc.*, Case No. BC688477, California Superior Court, County of Los Angeles,
7 Honorable Judge Daniel J. Buckley presiding; *Huynh v. Polypeptide Laboratories, Inc.*, Case No.
8 BC680872, California Superior Court, County of Los Angeles, Honorable Judge Rafael A. Ongkeko
9 presiding; *Guzman v. Century Blinds*, Case No. RIC1723654, California Superior Court, County of
10 Riverside, Honorable Judge Sunshine S. Sykes presiding; *George v. Convergence Marketing*, Case
11 No. CIVDS1901039, California Superior Court, County of San Bernardino, Honorable Judge David S.
12 Cohn presiding; *Coffee, et al. v. Flyers Transportation Energy, LLC*, Case No. 34-2017-00222084,
13 California Superior Court, County of Sacramento, Honorable Judge Alan G. Perkins presiding; *Romero*
14 *v. Fillmore Hospitality, LLC*, Case No. BC705667, California Superior Court, County of Los Angeles,
15 Honorable Judge Maren E. Nelson presiding; *Wennerstrom, et al. v. Giant Inland Empire R.V. Center*,
16 Case No. CIVDS1617291, California Superior Court, County of San Bernardino, Honorable Judge
17 David S. Cohn presiding; *Contreras, et al. v. Letter Ride, LLC*, Case No. 37-2018-00020841-CU-OE-
18 CTL, California Superior Court, County of San Diego, Honorable Judge Eddie C. Sturgeon presiding;
19 *Davis v. WeDriveU*, Case No. 18CV322578, California Superior Court, County of Santa Clara,
20 Honorable Judge Brian C. Walsh presiding; *Acuna v. Canton Food Co., Inc.*, Case No. BC685001,
21 California Superior Court, County of Los Angeles, Honorable Judge David S. Cunningham presiding;
22 and *Contreras v. Worldwide Flight Services, Inc.*, Case No. 2:18-cv-06036-PSG-SS, United States
23 District Court for the Central District of California, the Honorable Judge Philip S. Gutierrez presiding.

24 9. As co-lead counsel for Plaintiff and the proposed Settlement Class, I have been
25 intimately involved in every aspect of this case from its inception through the present, and I believe that
26 the proposed Settlement is a favorable result for the Settlement Class Members under the circumstances
27 presented.

1 10. On July 30, 2024, Plaintiff filed a putative class action complaint against Defendant
2 JJ&S Asbestos Removal, Inc. (“Defendant”) in San Diego County Superior Court, case number 30-
3 2024-01415808-CU-OE-CXC (“*Jeronimo Bran* Action”). On July 30, 2024, Plaintiff submitted a
4 letter to the California Labor & Workforce Development Agency (“LWDA”) and Defendant advising
5 of his intention of filing a PAGA claim based on the Labor Code violations alleged in his operative
6 complaint. On October 4, 2024, Plaintiff filed a First Amended Class Action and Representative
7 Action Complaint adding a cause of action for civil penalties under the PAGA.

8 11. On January 16, 2026, in the *Stephen Armas v. JJ&S Asbestos Removal, Inc.* (“*Armas*
9 *Action*”) and pursuant to a stipulation and Court order, Plaintiff Armas filed a Second Amended Class
10 and Representative Action Complaint adding Plaintiff Jeronimo Bran as a plaintiff.

11 12. On February 11, 2026, per Plaintiff Jeronimo Bran’s request, the *Jeronimo Bran* Action
12 was dismissed.

13 13. As directed by the Court, on April 6, 2026, Plaintiff Armas filed a Third Amended
14 Class and Representative Action adding Plaintiff Jeronimo Bran as a named plaintiff.

15 14. Plaintiff Armas and Plaintiff Jeronimo Bran’s (collectively, “Plaintiffs”) primary
16 allegations are that Defendant: (1) failed to pay all overtime wages; (2) failed to pay all minimum
17 wages; (3) engaged in meal period violations; (4) engaged in rest period violations; (5) engaged in paid
18 sick leave violations; (6) untimely paid wages; (7) engaged in wage statement violations; (8) is subject
19 to waiting time penalties; (9) failed to reimburse business expenses; (10) engaged in unfair
20 competition; and (11) is liable for civil penalties under the PAGA.

21 15. Plaintiffs contend that they, and the Class Members, are entitled to unpaid wages and
22 premiums, reimbursement, penalties (including and not limited to, penalties pursuant to PAGA), and
23 attorneys’ fees and costs.

24 16. After agreeing to participate in private mediation, Defendant informally produced an
25 11% sampling of timekeeping and payroll data, Plaintiffs’ personnel files, and other data points
26 including the number of class members, workweeks, and pay periods. After a detailed review of the
27 payroll and time records and other information produced by Defendant, Class Counsel drew on their
28

1 extensive experience in similar cases to assess the strengths and weaknesses of Plaintiffs' case. This
2 informal discovery allowed the parties to assess the merits and value of Plaintiffs' claims and
3 Defendant's defenses thereto, if a settlement could not be reached.

4 17. On December 4, 2025, after extensive research and analysis, a full-day mediation was
5 held with Todd Smith, an experienced wage and hour class action mediator. During mediation, the
6 parties vigorously debated their opposing legal positions, the likelihood of certification of Plaintiffs'
7 claims, and the legal basis for the claims and defenses. Ultimately, the parties agreed in principle on a
8 class-wide resolution and memorialized it in a MOU. In the months that followed, the parties finalized
9 the terms of settlement and executed the Joint Stipulation and Settlement Agreement of Class Action
10 and PAGA Representative Action Claims ("Settlement").

11 18. Plaintiffs submitted the Settlement to the Court with their Motion for Preliminary
12 Approval on April 23, 2026. On May 15, 2026, the Court issued an Order Granting Preliminary
13 Approval of the Settlement. A true and correct copy of the Order Granting Preliminary Approval is
14 attached hereto as **Exhibit A**.

15 19. The Settlement Class encompasses "all current and former non-exempt of Defendant
16 who worked in California during the Class Period." The Class Period is July 10, 2020 through March
17 4, 2026.

18 20. In my experience in wage and hour class action matters similar to this one, fee awards
19 generally average around one-third of the gross recovery.

20 21. Here, Class Counsel's fee request is \$108,500.00 (35% of Total Settlement Amount).
21 The fee award will be split as follows: 50% to Ferraro Vega Employment Lawyers, Inc. and 50% to
22 Haines Law Group, APC and Lidman Law, APC.

23 22. Plaintiffs have provided written approval of the split of attorneys' fees in this action.

24 23. My law firm's and co-counsel's work on this case includes, but is not limited to: pre-
25 filing investigation, analyzing Plaintiff's claims, conducting pre-filing investigation, analyzing
26 Plaintiffs' claims, conducting legal research, reviewing Plaintiffs' personnel files, reviewing and
27 analyzing timekeeping data and payroll records, preparing for and attending mediation, negotiating and
28

1 revising the MOU, negotiating and revising the long-form Settlement, preparing the Motions for
2 Preliminary and Final Approval, overseeing the settlement administration process, communicating
3 with Settlement Class Members, and otherwise litigating this case.

4 24. As discussed above, this case presented significant risk as to both class certification and
5 merits considerations. Accordingly, it is fair and reasonable to account for these risks in compensating
6 Class Counsel. Class Counsel should also be compensated for the risks involved in undertaking this
7 litigation and expending considerable effort, all while working on a pure contingency basis. Since
8 undertaking representation of Plaintiffs, Class Counsel have borne all the costs of litigation without
9 receiving any compensation for over 2 years. During this time, Class Counsel have expended a total of
10 \$20,911.23 in actual costs and have devoted substantial time to this litigation and expect to incur
11 approximately (\$450 in future costs for filing the instant motion, filing the final declaration regarding
12 distribution of settlement, service and messenger fees, postage fees, and/or court costs for future court
13 appearances). A true and correct copy of my firm's costs is attached hereto as **Exhibit B**. Class
14 Counsel's request is fair, adequate, and reasonable, as all of these costs are documented and reasonably
15 incurred.

16 25. My experience in matters similar to this one was integral in evaluating the strengths and
17 weaknesses of this case and the reasonableness of the Settlement. Practice in the narrow field of wage
18 and hour litigation requires skill and knowledge concerning the rapidly evolving substantive state and
19 federal law, as well as the procedural law of class action litigation. This case involved legal issues
20 including questions surrounding Defendant's obligation to "provide" meal periods and the propriety of
21 statutory penalties, to name just a few.

22 26. Given the considerable potential for adverse outcomes in this case, including, but not
23 limited to losing on class certification and/or merits issues, the contingent risk borne by Class Counsel
24 was great. In addition to the legal and procedural challenges this lawsuit presented, there were also
25 other practical challenges. There was a real risk that my firm and co-counsel's firm would not be
26 compensated for our work, because our firms handled this matter on a purely contingent basis. Thus,
27 Plaintiffs were not responsible for paying attorneys' fees and Class Counsel could only recover
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attorneys' fees if Plaintiffs were successful. By the time I (or someone from my firm) attend the final approval hearing in this matter, my firm and co-counsel firm will have litigated this case for over two years with no payment, all while bearing the risk of non-payment if Plaintiffs were unsuccessful. Moreover, as discussed above, Class Counsel has expended a total of \$20,911.23 in actual costs and have devoted substantial time to this litigation and expect to incur approximately (\$450 in future costs for filing the instant motion, filing the final declaration regarding distribution of settlement, service and messenger fees, postage fees, and/or court costs for future court appearances) in litigation costs on a contingency basis, which also carried risk because Class Counsel would not recoup its costs in the event Plaintiff did not prevail in this lawsuit.

27. In this case, Class Counsel have a lodestar of **\$131,537.00** which is higher than the \$108,500.00 fee request, without the use of any multiplier. The following is a general summary showing the number of hours of work performed by each attorney and paralegal in my firm and/or co-counsel's firm on this case:

Name	Rate	Hours	Pre-Multiplier Lodestar
Scott M. Lidman (27th Year Attorney)	\$950	48.2	\$45,790.00
Paul K. Haines (19th Year Attorney)	\$975	20.1	\$19,597.50
Milan Moore (10th Year Attorney)	\$725	16.5	\$11,962.50
Tiara Gose-Hardy (7th Year Attorney)	\$625	22.3	\$13,937.50
Ferraro Vega Employment Lawyers, Inc.	\$685	52.7	\$36,099.50
Paralegals	\$250	16.6	\$4,150.00
Total Lodestar			\$131,537.00

28. My proposed hourly rate of \$950, Mr. Haines' proposed hourly rate of \$975, Ms. Moore's proposed hourly rate of \$725, and Ms. Gose-Hardy's rate of \$625, are reasonable in light of our respective skills, wage and hour class action litigation experience, reputation, and fee awards to other attorneys of similar experience in California. Moreover, our requested hourly rates and our co-counsel's requested hourly rates are in line with the *Laffey* Matrix, a true and correct copy of which is attached hereto as **Exhibit C**. Based on the *Laffey* Matrix, the hourly rate for a 20-plus year attorney

1 is \$1,227, the hourly rate for a 19th year attorney is \$1,019, the hourly rate for a 10th year attorney is
2 \$902, and the hourly rate for a 7th year attorney is \$625.

3 29. The attorneys' fee award requested is consistent with those routinely awarded by
4 California superior courts. California superior courts frequently grant common fund awards of 33%.
5 *See, e.g., Ochoa v. Haralambos Beverage Co.*, No. BC319588 (Super. Ct., Los Angeles County, Feb.
6 1, 2007) (33.3% fee award with no mention of lodestar crosscheck); *Jones v. Alliance Imaging, Inc.*,
7 No. RG05210418 (Super. Ct., Alameda County, Nov. 27, 2006) (33% fee award with no mention of
8 lodestar crosscheck); *Wisniewski v. Pacific Maritime Assoc.*, No. BC293134 (Super. Ct., Los Angeles
9 County, Nov. 20, 2006) (30.7% fee award from \$12.9 million settlement with no mention of lodestar
10 crosscheck); *Garcia v. Save Mart Supermarkets*, No. 312026 (Super. Ct., Stanislaus County, Aug. 3,
11 2004) (33% fee award with no mention of lodestar crosscheck); *Terrell v. Ocean's 11 Casino, Inc.*,
12 No. GIC795732 (Super. Ct., San Diego County, Feb. 10, 2004) (approving 33% fee award); *Big Lots*
13 *Overtime Cases*, JCC Proceeding No. 4283, San Bernardino County Superior Court, Feb 4, 2004)
14 (approving a 33% fee recovery); *Tokar v. GEICO*, (San Diego Superior Court, No. GIC 810166, July
15 9, 2004) (approving award of 33-1/3%); *Davis v. The Money Store, Inc.*, (San Diego County Superior
16 Court, No. 99AS01716, December 26, 2000) (33-13% of the settlement).

17 30. Indeed, numerous courts have awarded attorneys' fees of up to, or in excess of 40% of
18 the common fund. *Ammari Electronics, et al. v. Pacific Bell Directory*, Alameda County Sup. Ct., Case
19 No. RG05198014 (awarded 43.8%) (2015); *In re California Indirect Purchaser X Ray Film Antitrust*
20 *Litigation*, San Francisco Sup. Ct. 1998 (citing *Abzug v. Kerkorian*, *Los Angeles Sup. Ct.*, Nov. 19,
21 1990, Case No. CA-00981 (45%) and *Haitz v. Meyer*, Alameda County Sup. Ct., August 20, 1990, Case
22 No. 5729683 (45%)); *Hall v. Cinema 7, Inc.*, San Francisco Sup. Ct., July 16, 2008, Case No. CGC-01-
23 409105 (53%); and *Rundberg v. Intrawest Napa Dev. Co.*, Napa County Sup. Ct., January 15, 2014,
24 Case No. 26-56886 (40%).

25 31. Being a private law practice my firm can only properly litigate a limited number of
26 cases at one time. The professional demands of this case were significant, including a significant
27 number of hours of attorney and paralegal time. This litigation precluded my firm from other
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1 employment due to the time and financial commitments required by the case. Indeed, because my firm
2 takes on cases on a purely contingency fee, we are only compensated for our time if we successfully
3 settle a case or prevail at trial. Accordingly, I believe the requested fees are reasonable.

4 32. The requested service award to Plaintiffs of \$10,000.00 each is reasonable. Plaintiff
5 took on significant risks, including the risk that they could be liable for Defendant's costs if this case
6 was unsuccessful. Plaintiffs also were integral in the prosecution of this action, by, among other things,
7 providing substantial factual information and documents to Class Counsel, multiple conferences with
8 Class Counsel to discuss the claims and theories at issue in the litigation, as well as the significant risks
9 Plaintiffs undertook by agreeing to serve as the named plaintiffs in this case. Further, Plaintiffs put
10 their future employment prospects at risk by becoming a named plaintiff in an employment action since
11 the lawsuit is public record and may become known to prospective employers when evaluating them
12 for employment. Additionally, Plaintiffs agreed to a general release and a 1542 waiver.

13 33. Plaintiff Armas submitted the Settlement and Court's Order Granting Preliminary
14 Approval of the Settlement to the LWDA via the LWDA's website on June 9, 2026. True and correct
15 copies of the proof of submission to the LWDA are attached hereto as **Exhibit D**.

16 34. Pursuant to Labor Code § 2699(1)(2), Plaintiffs are submitting a copy of the Motion for
17 Final Approval and all supporting documents via the LWDA's website on the same date that they are
18 filing this motion and will file a proof of service after the Motion for Final Approval and all supporting
19 documents are submitted to the LWDA.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing is
21 true and correct. Executed on September 9, 2026 at El Segundo, California.

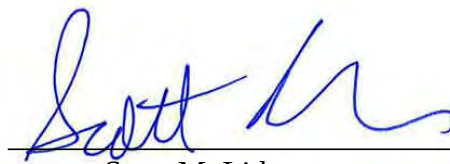
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23
24 
25 Scott M. Lidman

EXHIBIT A

EXHIBIT A

FILED
San Diego Superior Court

MAY 15 2026

Clerk of the Superior Court
By: K. Mulligan, Deputy

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

STEPHEN ARMAS and JOSE ISRAEL
JERONIMO BRAN, as individuals and on
behalf of others similarly situated and the State
of California under the Private Attorneys
General Act,

Plaintiffs,

vs.

JJ&S ASBESTOS REMOVAL, INC., and
DOES 1 through 50, inclusive,

Defendants.

Case No. 24CU000405C

Hon. Blaine K. Bowman
Dept. 74

CLASS ACTION

**[PROPOSED] ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Motion for Prelim. App. Hearing:

Date: May 15, 2026

Time: 8:30 a.m.

[Filed concurrently with Plaintiffs' Notice of
Motion and Motion for Preliminary Approval of
Class Action Settlement, Plaintiffs' Memorandum
of Points and Authorities, and Declaration of
Nicholas J. Ferraro, Declaration of Paul K. Haines,
Declaration of Scott M. Lidman, and Declaration of
Jodey Lawrence of Phoenix Settlement
Administrators in Support]

Action Filed: July 10, 2024

1 This matter came on for hearing on May 15, 2026, at 8:30 a.m. in Department 74 of the above-
2 captioned Court on Plaintiffs' Motion Preliminary Approval of Class Action Settlement ("Motion").

3 Having fully reviewed the Motion, the supporting Memorandum of Points and Authorities,
4 Declaration of Nicholas J. Ferraro (and its exhibits), Declaration of Paul K. Haines, Declaration of
5 Scott M. Lidman, including the settlement agreement ("Settlement"), and the notice attached as an
6 exhibit to the Settlement, and in recognition of the Court's duties (to make a preliminary determination
7 as to the reasonableness of any proposed class action settlement; to ensure proper notice is provided to
8 all class members in accordance with due process requirements; and to set a final approval hearing to
9 consider the good faith, fairness, adequacy and reasonableness of the proposed Settlement), the Court
10 makes the following determinations and orders:

11 1. The Court conditionally finds, for the purposes of approving this settlement only, the
12 proposed class meets the requirements for certification under § 382 of the California Code of Civil
13 Procedure: (a) the proposed class is ascertainable and so numerous joinder of all class members is
14 impracticable; (b) there are questions of law or fact common to the proposed class, and a well-defined
15 community of interest among members of the proposed class with respect to the subject matter of the
16 class action; (c) the claims of the class representative are typical of the claims of the members of the
17 proposed class; (d) the class representative appears to be adequate to serve in that role; (e) a class action
18 is superior to other available methods for an efficient adjudication of this controversy in the context of
19 settlement; and (f) counsel of record for the Plaintiffs are qualified to serve as class counsels.

20 2. The class is hereby defined and certified as: "all current and former non-exempt
21 employees of Defendant who worked in California during the Class Period [of July 10, 2020, through
22 March 4, 2026]".

23 3. The Court finds, on a preliminary basis, the Settlement, incorporated by this reference
24 in full, and made a part of this Order, appears to be within the range of reasonableness of a settlement
25 which could ultimately be given final approval by this Court.

26 4. The Court further finds, on a preliminary basis, (a) the non-reversionary Gross
27 Settlement Amount is fair and reasonable to the class when balanced against the probable outcome of
28 further litigation relating to class certification, liability and damages issues, and potential appeals;

1 (b) sufficient investigation, research, and informal discovery, have been conducted such that counsel
2 for the parties are able to reasonably evaluate their respective positions; (c) settlement at this time will
3 avoid substantial costs, delay, and risks presented by further prosecution of the litigation; and (d) the
4 proposed Settlement was reached through prudent and non-collusive negotiations.

5 5. The Court finds the allocation from the common fund to PAGA penalties, including the
6 LWDA's 65% share, as fair, adequate, and reasonable in light of the overall gross settlement and that
7 the proposed settlement of PAGA penalties has been adequately submitted to the LWDA in advance of
8 the preliminary approval hearing. Therefore, the Court **APPROVES** the PAGA payment pursuant to
9 Labor Code § 2699(s)(2).

10 6. Accordingly, good cause appearing, the Motion for Order Granting Preliminary
11 Approval of Class Action Settlement is **GRANTED**.

12 7. Class members are therefore defined pursuant to the terms set forth in the Settlement.

13 8. The Court further finds the proposed notice fairly and adequately advises class members
14 of (a) pendency of the Settlement; (b) conditional class certification for settlement purposes only;
15 (c) preliminary Court approval of the proposed Settlement; (d) the date, time and place of the Final
16 Approval Hearing; (e) the terms of the proposed Settlement and the benefits available to the class under
17 the Settlement; (f) their right to receive a proportionate share of the Net Settlement Amount without
18 the need to return a claim form; (g) their right to request exclusion, and the procedures and deadline for
19 doing so; (h) their right to object to the Settlement, and the procedure and deadline for doing so; and
20 (i) their right to appear at the final approval hearing.

21 9. The Court further finds the proposed notice provides the best practicable notice to the
22 Class and comports with the constitutional requirements, including those of due process. The Court
23 further finds that mailing of the notice to the last known address of all class members with measures
24 taken for verification of an address and skip tracing of bad addresses, as specifically described within
25 the Settlement, constitutes an effective method of notifying class members of their rights with respect
26 to the class action and the Settlement.

27 10. Therefore, for good cause, the Court **APPROVES** the notice ^{as modified} for distribution to the class
28 pursuant to the notice procedures set forth in full in the Settlement.

Accordingly, it is **ORDERED** that:

a. Phoenix Settlement Administrators be appointed the Administrator of the Settlement, as more specifically set forth in the Settlement;

b. Ferraro Vega Employment Lawyers, Haines Law Group, APC and Lidman Law, APC be appointed as class counsels;

c. Plaintiffs Stephen Armas and Josue Israel Jeronimo Bran be appointed as class representatives;

d. All deadlines, terms, and conditions set forth in the Settlement incorporated by reference into this Order shall apply and govern the notice procedure and response deadlines;

e. Any class member who desires to object may appear in Court at the Final Approval Hearing to present oral objections;

f. If for any reason the Court does not execute and file an Order Granting Final Approval of Class Action Settlement, or if the Effective Date, as defined in the Settlement, does not occur for any reason whatsoever, the Settlement and the proposed Settlement that is the subject of this Order, and all evidence and proceedings had in connection therewith, shall be restored without prejudice to the *status quo ante*, pursuant to the terms set forth in the Settlement.

11. **IT IS FURTHER ORDERED** that the Final Approval Hearing and a hearing on Plaintiffs' Motion for Attorneys' Fees and Costs shall both be held before the undersigned at 8:30 AM [hearing time] on Oct. 02, 2026 [hearing date], in this Department.

12. At the Final Approval Hearing, the Court will consider the fairness, adequacy, and reasonableness of the proposed Settlement preliminarily approved in this Order and notice process to be effectuated, and to consider the application for a class representative service payment to the class representative, the administration expenses, attorneys' fees, and costs.

13. The Court reserves the right to continue the Final Approval Hearing without further notice to the class. However, if written objections are submitted, class counsel is ordered to serve notice on any such objecting class member of the new date and time of the Final Approval Hearing.

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IT IS SO ORDERED.

Date: 5-15-26

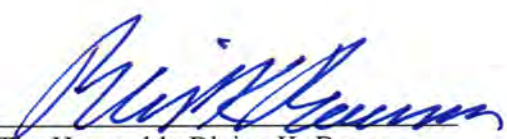

The Honorable Blaine K. Bowman
Judge of the Superior Court

EXHIBIT B

EXHIBIT B

Expense Summary for Lidman Law, APC and Haines Law Group, APC
Armas, et al. v. JJ&S Asbestos Removal, Inc.

EXPENSE	AMOUNT
Expert Costs: Analysis for Mediation	\$6,255.00
Filing, Service, and Messenger Fees	\$2,153.05
Jury Fees	\$150.00
Copying Costs	\$11.50
Document Purchase Fees	\$19.50
Postage Costs	\$29.15
Anticipated Costs for filing the Final Approval motion, court appearances, service fees, copying and postage	\$450.00
TOTAL:	\$9,068.20

EXHIBIT C

EXHIBIT C

LAFFEY MATRIX

[History](#)
[Case Law](#)
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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/25- 5/31/26	1.075336	\$277	\$508	\$625	\$902	\$1,019	\$1,227
6/01/24- 5/31/25	1.080182	\$258	\$473	\$581	\$839	\$948	\$1,141
6/01/23- 5/31/24	1.059295	\$239	\$437	\$538	\$777	\$878	\$1,057
6/01/22- 5/31/23	1.085091	\$225	\$413	\$508	\$733	\$829	\$997
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424

6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been approved in a number of cases. See, e.g., DL v. District of Columbia, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* $i_{\frac{1}{2}}$ Years Out of Law School $i_{\frac{1}{2}}$ is calculated from June 1 of each year, when most law students graduate. $i_{\frac{1}{2}}1-3$ " includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). $i_{\frac{1}{2}}4-7$ " applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier $i_{\frac{1}{2}}1-3$ " from June 1, 1996 until May 31, 1999, would move into tier $i_{\frac{1}{2}}4-7$ " on June 1, 1999, and tier $i_{\frac{1}{2}}8-10$ " on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

EXHIBIT D

EXHIBIT D

From: no-reply@formassembly.com
To: [Marlyn Ajanel](#)
Subject: Thank you for your Proposed Settlement Submission
Date: Tuesday, June 9, 2026 1:49:04 PM

06/09/2026 01:47:29 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

On 06/09/2026 01:47:29 PM your Proposed Settlement was successfully processed for case number LWDA-CM-1042673-24

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm

From: no-reply@formassembly.com
To: [Marlyn Ajanel](#)
Subject: Thank you for your Court Order or Judgment Submission
Date: Tuesday, June 9, 2026 2:18:45 PM

06/09/2026 02:18:16 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Court Order or Judgment

On 06/09/2026 02:18:16 PM your Court Order or Judgment was successfully processed for case number LWDA-CM-1042673-24

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

Website: http://labor.ca.gov/Private_Attorneys_General_Act.htm