

Nicholas J. Ferraro (State Bar No. 306528)
Lauren N. Vega (State Bar No. 306525)
Mariela R. Romo (State Bar No. 341657)
Ferraro Vega Employment Lawyers, Inc.
333 Camino del Rio South, Suite 300
San Diego, California 92108
(619) 693-7727 main / (619) 350-6855 fax
nick@ferrarovega.com / lauren@ferrarovega.com
mariela@ferrarovega.com

Attorneys for Plaintiff
STEPHEN ARMAS

[Additional counsel on following page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO – HALL OF JUSTICE COURTHOUSE

STEPHEN ARMAS, on behalf of others
similarly situated and the State of California
under the Private Attorneys General Act,

Plaintiffs,

v.

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

Defendants.

Case No. 24CU000405C

*[Assigned for all purposes to the Hon.
Blaine K. Bowman, Dept. C-74]*

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

Date:

Time:

Dept.: C-74

LIDMAN LAW, APC

Scott M. Lidman (SBN 199433)

slidman@lidmanlaw.com

Milan Moore (SBN 308095)

mmoore@lidmanlaw.com

Tiara Gose-Hardy (SBN 323823)

tgose@lidmanlaw.com

2155 Campus Drive, Suite 150

El Segundo, California 90245

Tel: (424) 322-4772

Fax: (424) 322-4775

Attorneys for Plaintiff

JOSUE ISRAEL JERONIMO BRAN

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)

phaines@haineslawgroup.com

2155 Campus Drive, Suite 180

El Segundo, California 90245

Tel: (424) 292-2350

Fax: (424) 292-2355

Attorneys for Plaintiff

JOSUE ISRAEL JERONIMO BRAN

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
3 for named plaintiffs Josue Israel Jeronimo Bran and Stephen Armas (collectively, “Plaintiffs”) and the proposed Settlement Class in the above-captioned matter. I am a member in good
4 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
6 if called upon to do so.

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

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

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

25 5. During my employment at Littler Mendelson, I played a significant role in the
26 class actions that I was staffed on, and ran many on my own both as an Of Counsel and as a
27 Shareholder. In particular, I received a wide-array of wage and hour class action experience
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performing the following types of tasks: drafting demurrers, motions to strike and/or dismiss; removing actions from state court to federal court; drafting and responding to written discovery; drafting and opposing discovery related motions; arguing discovery related motions; drafting motions to consolidate related matters; interviewing putative class members and obtaining declarations in connection with class certification; drafting oppositions to motions for class certification; drafting motions for decertification following class certification; conducting exposure analyses to assess the strengths and weaknesses of asserted claims, the likelihood of prevailing at class certification and potential damages resulting from such claims; drafting mediation briefs; serving as the primary contact to in-house counsel; deposing named plaintiffs and putative class members; deposing retained expert witnesses; and defending the depositions of corporate witnesses. I also was involved in the negotiations and settlements of many large wage and hour class actions. In short, I played an integral role in all aspects of litigation from the inception of a matter through and beyond class certification. I also supervised the work of several junior attorneys who were staffed on the same wage and hour class actions.

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

- ▶ *Ortega v. J.B. Hunt Transport, Inc.*, Case No. 07-cv-8336-RGK-AFMx, United States District Court, Central District of California, Honorable Gary Klausner, presiding¹.
- ▶ *Aceves v. J.B. Hunt Transport, Inc.*, Case No. CIVDS1306133, California Superior Court, County of San Bernardino, Honorable Michael Sachs, presiding.

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 ▶ *Moreno v. J.B. Hunt Transport, Inc.*, Case No. BC388612, California
2 Superior Court, County of Los Angeles, Honorable Mel Red Recana,
3 presiding.
- 4 ▶ *Newcomb v. J.B. Hunt Transport, Inc.*, Case No. RG16815734, California
5 Superior Court, County of Alameda, Honorable Winifred Smith, presiding.
- 6 ▶ *Vaquero v. Stoneledge Furniture, LLC, et al.*, Case No. 12-cv-08590-PA-
7 MAN, United States District Court, Central District of California,
8 Honorable Percy Jeronimo Bran, presiding.
- 9 ▶ *Vaquero v. Stoneledge Furniture, LLC, et al.*, Case No. BC388612,
10 California Superior Court, County of Los Angeles, Honorable Elihu Berle,
11 presiding.²
- 12 ▶ *Dugan v. Stoneledge Furniture, LLC*, Case No. 16-cv-01125-PA-FFMx,
13 United States District Court, Central District of California, Honorable Percy
14 Jeronimo Bran, presiding.
- 15 ▶ *Klune v. Stoneledge Furniture, LLC*, Case No. 14-cv-03986-PA-FFMx,
16 United States District Court, Central District of California, Honorable Percy
17 Jeronimo Bran, presiding.
- 18 ▶ *Diaz v. ABM Industries, Inc.; Ampco Parking*, Case No. BC362932,
19 California Superior Court, County of Los Angeles, Honorable Jane
20 Johnson, presiding.³
- 21 ▶ *Adams v. Luxottica Retail North America, Inc.*, Case No. 07CC01346,
22 California Superior Court, County of Orange, Honorable Thierry Patrick
23 Colaw, presiding.

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

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

- 1 ▶ *Sakkab v. Luxottica Retail North America, Inc.*, Case No. 12-cv-00436-
2 GPC-KSC, United States District Court, Southern District of California.⁴
- 3 ▶ *Page v. Oakley, Inc.*, Case No. FCS041512, California Superior Court,
4 County of Solano, Honorable Paul Berman, presiding.
- 5 ▶ *Ramirez v. Oakley, Inc.*, Case No. 30-2014-00731617-CU-OE-CJC
6 California Superior Court, County of Orange, Honorable William Claster,
7 presiding.
- 8 ▶ *Ramirez v. Oakley, Inc.*, Case No. 30-2014-00723846-CU-DE-CXC,
9 California Superior Court, County of Orange, Honorable William Claster,
10 presiding.
- 11 ▶ *Sierra v. Oakley, Inc.*, Case No. 13-cv-00319-AG-JPR, United States
12 District Court, Central District of California, Honorable Andrew Guilford,
13 presiding.⁵
- 14 ▶ *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx,
15 United States District Court, Central District of California, Honorable
16 Margaret Morrow, presiding.
- 17 ▶ *Cordova v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx,
18 United States District Court, Central District of California, Honorable
19 Margaret Morrow, presiding.
- 20 ▶ *Khelghatian v. Comerica Bank, et al.*, Case No. 11-cv-7689-DSF-FFMx,
21 United States District Court, Southern District of California, Honorable
22 John A. Houston, presiding.
- 23 ▶ *Babasa v. Comerica Bank, et al.*, Case No. 11-cv-0595-JAH-BGS, United
24 States District Court, Central District of California, Honorable Margaret
25 Morrow, presiding.

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

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

- 1 ▶ *Bernal v. Comerica Bank, et al.*, Case No. 11-cv-01298-JAH-BGS, United
2 States District Court, Central District of California, Honorable Margaret
3 Morrow, presiding.
- 4 ▶ *Khalili v. Comerica Bank, et al.*, Case No. 09-cv-08905-MMM-PLAx,
5 United States District Court, Northern District of California.
- 6 ▶ *Granata v. Comerica Bank, et al.*, Case No. 37-2011-00086316-CU-OE-
7 CTL, California Superior Court, County of San Diego, Honorable Jeffrey
8 B. Barton, presiding.
- 9 ▶ *Mathews v. Comerica Bank, et al.*, Case No. 111CV194781, California
10 Superior Court, County of Santa Clara.
- 11 ▶ *Gallegos v. Comerica Bank, et al.*, Case No. BC455515, California
12 Superior Court, County of Los Angeles, Honorable Terry Green, presiding.
- 13 ▶ *Rumohr v. Comerica Bank, et al.*, Case No. CGC-11-508433, California
14 Superior Court, County of San Francisco.
- 15 ▶ *Smith v. Werner Enterprises*, Case No. 15-cv-02978-RS, United States
16 District Court, Northern District of California, Honorable Richard
17 Seeborg, presiding.

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

7 8. I have been appointed Class Counsel in: *Guardado v. Wesley Allen, Inc.*, Case
8 No. BC683027, California Superior Court, County of Los Angeles, Honorable Judge Carolyn B.
9 Kuhl presiding; *Rodriguez v. Satco, Inc.*, Case No. BC682137, California Superior Court,
10 County of Los Angeles, Honorable Judge Ann I. Jones presiding; *Ong v. Howard's Appliances,*
11 *Inc.*, Case No. 30-2017-00964213-CU-OE-CXC, California Superior Court, County of Orange,
12 Honorable Judge William Claster presiding; *Hanke v. C&W Facility Services, Inc.*, Case No.
13 CIVDS1814412, California Superior Court, County of San Bernardino, Honorable Judge David
14 Cohn presiding; *Molina v. Mader News, Inc.*, Case No. BC685960, California Superior Court,
15 County of Los Angeles, Honorable Judge Yvette M. Palazuelos presiding; *Alvarez v.*
16 *Salamander Fire Protection, Inc.*, Case No. BC688326, California Superior Court, County of
17 Los Angeles, Honorable Judge William F. Highberger presiding; *Rodriguez v. H.F. Cox, Inc.*,
18 Case No. BC653164, California Superior Court, County of Los Angeles, Honorable Judge
19 Carolyn B. Kuhl presiding; *Fregoso v. Amerigas Propane, Inc.*, Case No. BC697973, California
20 Superior Court, County of Los Angeles, Honorable Judge Rafael A. Ongkeko presiding; *Teran*
21 *v. Western Plastics, Inc.*, Case No. RIC1722619, California Superior Court, County of Riverside,
22 Honorable Judge Sunshine Sykes presiding; *Villegas de Torres v. El Monte Superstore Inc.*,
23 Case No. BC688477, California Superior Court, County of Los Angeles, Honorable Judge
24 Daniel J. Buckley presiding; *Huynh v. Polypeptide Laboratories, Inc.*, Case No. BC680872,
25 California Superior Court, County of Los Angeles, Honorable Judge Rafael A. Ongkeko
26 presiding; *Guzman v. Century Blinds*, Case No. RIC1723654, California Superior Court, County
27 of Riverside, Honorable Judge Sunshine S. Sykes presiding; *George v. Convergence Marketing,*
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1 Case No. CIVDS1901039, California Superior Court, County of San Bernardino, Honorable
2 Judge David S. Cohn presiding; *Coffee, et al. v. Flyers Transportation Energy, LLC*, Case No.
3 34-2017-00222084, California Superior Court, County of Sacramento, Honorable Judge Alan G.
4 Perkins presiding; *Romero v. Fillmore Hospitality, LLC*, Case No. BC705667, California
5 Superior Court, County of Los Angeles, Honorable Judge Maren E. Nelson presiding;
6 *Wennerstrom, et al. v. Giant Inland Empire R.V. Center*, Case No. CIVDS1617291, California
7 Superior Court, County of San Bernardino, Honorable Judge David S. Cohn presiding;
8 *Contreras, et al. v. Letter Ride, LLC*, Case No. 37-2018-00020841-CU-OE-CTL, California
9 Superior Court, County of San Diego, Honorable Judge Eddie C. Sturgeon presiding; *Davis v.*
10 *WeDriveU*, Case No. 18CV322578, California Superior Court, County of Santa Clara,
11 Honorable Judge Brian C. Walsh presiding; *Acuna v. Canton Food Co., Inc.*, Case No.
12 BC685001, California Superior Court, County of Los Angeles, Honorable Judge David S.
13 Cunningham presiding; and *Contreras v. Worldwide Flight Services, Inc.*, Case No. 2:18-cv-
14 06036-PSG-SS, United States District Court for the Central District of California, the Honorable
15 Judge Philip S. Gutierrez presiding.

16 9. As co-lead counsel for Plaintiffs and the proposed Settlement Class, I have been
17 intimately involved in every aspect of this case, and I believe that the proposed Settlement is a
18 favorable result for the Settlement Class Members under the circumstances presented.

19 10. The details of the work completed by my firm and/or my co-counsel are set forth
20 in the declaration of Nicholas J. Ferraro filed concurrently herewith. I have reviewed the
21 declaration of my co-counsel, Nicholas Ferraro, filed concurrently herewith and I agree with the
22 information regarding the facts, claims, defenses and other information contained therein.

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

25 Executed on April 15, 2026, at El Segundo, California.

26 
27 _____

28 Scott M. Lidman