

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
HECTOR GARCIA

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
HECTOR GARCIA

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

HECTOR GARCIA, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

FORGIATO INC., a California corporation; and
DOES 1 through 100, inclusive,
Defendants.

Case No.: 24STCV31730

*[Assigned for all purposes to the Hon. Elaine Lu,
Dept. SSC-9]*

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

Date: May 21, 2026
Time: 10:00 a.m.
Dept.: SSC-9

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

2 1. I am an Associate with Lidman Law, APC, counsel for the named plaintiff Hector Garcia
3 (“Plaintiff”) 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 personal
5 knowledge of the facts stated in this declaration and could testify competently to them if called upon to
6 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 several
10 employment litigation firms, where I successfully represented employees in discrimination, harassment,
11 retaliation and wrongful termination cases in both state and federal court. While non-exhaustive, the type
12 of work I performed included: conducting client intakes, performing pre-filing research and analysis,
13 drafting complaints, attending court hearings, corresponding with opposing counsel, drafting and
14 responding to written discovery, preparing for and taking and defending depositions, drafting and
15 opposing motions, demurrers, motions to compel, drafting mediation briefs, and attending mediations.

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

19 4. I have been appointed Class Counsel in *Jimenez v. Signtech Electrical Advertising, Inc.*,
20 Case No. 37-2023-00038995-CU-OE-CTL, California Superior Court, County of San Diego,
21 Honorable Judge James A. Mangione presiding; *Tapia v. Franco Whole Foods, LLC*, Case No. 37-
22 2023-00046908-CU-OE-CTL, California Superior Court, County of San Diego, Honorable Gregory
23 W. Pollack presiding; *Mendoza-Hernandez v. Pacific Snow Valley Resort, LLC*, Case No.
24 CIVSB2314151, California Superior Court, County of San Bernardino, Honorable Joseph T. Ortiz
25 presiding; *Soto v. United Scaffold*, Case No. 37-2022-00042002-CU-OE-CTL, California Superior
26 Court, County of San Diego, Honorable Michael T. Smyth presiding.

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

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

Executed on March 20, 2026, at El Segundo, California.

Tiara Gose-Hardy
Tiara Gose-Hardy