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Attorneys for Plaintiff TANIYA ABRON
on behalf of herself and all others similarly situated

SUPERIOR COURT OF CALIFORNIA

COUNTY OF ALAMEDA

TANIYA ABRON, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

UNIVERSITY HEALTHCARE ALLIANCE,
a California Corporation; and DOES 1-10,
inclusive,

Defendants.

Case No. RG20066438

Assigned for all purposes to
Hon. Evelio Grillo
Dept. 21

**DECLARATION OF CHRISTINA M.
LUCIO IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 23, 2023
Time: 9:00 a.m.
Dept: 21

Action Filed: June 30, 2020
SAC Filed: September 28, 2022
Trial Date: None Set

RES ID: 269846710090

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I, Christina M. Lucio, declare as follows:

1. I am an individual over the age of 18. I am Of Counsel to the Law Firm of James Hawkins, APLC. James Hawkins APLC is the attorney of record for Plaintiff TANIYA ABRON in this putative wage and hour class and PAGA representative action (“Plaintiff” or “Class Representative”) against Defendant University Healthcare Alliance (“Defendant” or “UHA”). I have personal knowledge of the facts set forth below, and if called to testify regarding them, I could and would do so competently.

2. I have been the lead day to day attorney in this action.

3. I submit this Declaration in support of Plaintiff Taniya Abron’s Motion for Preliminary Approval Of the Class Settlement Settlement (the “Preliminary Approval Motion”), which is filed concurrently herewith, along with the Memorandum of Points and Authorities.

4. Given the realistic value of Plaintiff's claims as set forth in detail in the concurrently filed Declaration of James R. Hawkins in Support of the Motion for Preliminary Approval of Class Action Settlement, we respectfully submit that the \$5,000,000 Gross Settlement Amount is an excellent result for the Settlement Class.

5. Preliminary approval should be granted since the Settlement will provide significant monetary relief to the Settlement Class.

6. The Settlement was the product of extensive arm's length negotiations between counsel and was facilitated by an experienced wage-and-hour class action mediator. Though cordial and professional, the Settlement negotiations were adversarial and non-collusive in nature. The Settlement reached is the product of substantial effort by the Parties and their counsel. Although Plaintiff and Class Counsel believed that there was a possibility of certifying the claims, they recognized the potential risk, expense, and complexity posed by litigation, such as unfavorable decisions on class certification, summary judgment, at trial and/or on the damages awarded, and/or on an appeal that can take several more years to litigate. Plaintiff's counsel

1 further recognized that the landscape of wage and hour litigation is dynamic. In addition, if
2 Defendant prevailed on any of its defenses, the Settlement Class Members may not have received
3 any monetary recovery.

4 7. Based on our experience in other wage and hour class litigation, I believe I am
5 qualified to evaluate the class claims and viability of defenses in this class action. In this case,
6 the recovery for each Settlement Class Member is reasonable, fair and adequate, and the
7 proposed settlement at this time is in the best interest of the Settlement Class. The Settlement
8 provides each Settlement Class Member with compensation for the alleged violations when
9 viewed in relation to the costs and risks inherent in obtaining class certification and proceeding
10 to trial.

11 8. I endorse the terms and conditions of the Settlement as set forth in the
12 abovementioned Settlement Agreement.

13
14 **Plaintiffs' Counsel Is Experienced in Wage and Hour Litigation**

15 9. In 2003, I graduated magna cum laude from the University of California, Riverside
16 with a Bachelor of Arts Degree. Following graduation, I attended the University of Southern
17 California, Gould School of Law (USC Law School). At various points during law school, I
18 worked with the USC Post-Conviction Justice Project, the Western Center for Disability Rights
19 and the Barrister's Domestic Violence Clinic. During the Summer of 2005, I was a law clerk for
20 the Law Offices of Bruce Austin (Safeco Insurance). In 2007, while a full-time law student, I
21 was also a Judicial Extern for the Honorable Sandra Ikuta, United States Court of Appeals, Ninth
22 Circuit. Thereafter, in 2007, I graduated from the USC Law School. The same year, I was
23 admitted to practice law in the State of California.

24 10. Since I was admitted to practice law, I have litigated a wide variety of matters on
25 both the plaintiff and defense side. Much of my early experience involved the litigation of
26 general business and labor & employment matters on an individual and class-wide basis. I
27
28

1 assisted with the representation of both employers and employees in various capacities, and
2 assisted employers on issues related to compliance with employment laws.

3
4 11. Since 2012, my work has largely been focused on individual employment litigation
5 and complex wage and hour class actions. In my practice as a class action plaintiffs' attorney, I
6 have been involved in litigating, mediating and settling numerous wage and hour class actions
7 dealing with class sizes ranging from several hundred to several thousand class members
8 resulting in settlements ranging from six figures to multimillion dollar settlements.

9 12. Since 2015, I have also been working in an Of Counsel role to the law firm of
10 James Hawkins APLC.

11 13. I have successfully litigated dozens of class and PAGA actions with James
12 Hawkins APLC as one of the counsels of record, including without limitation:

- 13 a. *Smith v. Space Exploration Technologies Corp.*, Los Angeles Superior Court, Case
14 No. BC55429;
- 15 b. *Placencia v. Amcor Packaging Distribution, Inc.*, Orange County Superior Court,
16 Case No. 30-2013-00694012-CU-OE-CXC;
- 17 c. *Trani v. Lisi Aerospace, et al.*, Los Angeles Superior Court, Case No. BC495527;
- 18 d. *Galvan v. Goodwin Co.*, Orange County Superior Court, Case No. 30-2013-
19 00637062-CU-OE-CXC;
- 20 e. *Reyes v. Bristol Fiberlite*, Orange County Superior Court, Case No. 30-2013-
21 00653425-CU-OE-CXC;
- 22 f. *Gutierrez v. HMT Tank*, USDC Central Dist., Case No. CV14-1967-CAS(MANx);
- 23 g. *Williams v. Il Fornaio America Corp.*, Sacramento County, 34-2011-0009616;
- 24 h. *Aguilar v. 7-Eleven, Inc.*, Orange County, Case No. 30-2009-002687141-CU-OE-
25 CXC;
- 26 i. *Madrigal v. Huntington Beach Market Broiler, Inc.*, Orange County, Case No. 30-
27 2012-00611260;
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Superior Court of Alameda County Public Portal

Make a Reservation

Abron VS University Healthcare Alliance, a California corpor

Case Number: RG20066438 Case Type: Unlimited Civil Category: Other Employment Complaint Case
Date Filed: 2020-06-30 Location: Rene C. Davidson Courthouse - Department 21

Reservation

Case Name: Abron VS University Healthcare Alliance, a California corpor	Case Number: RG20066438
Type: Motion re: (Motion for Preliminary Approval)	Status: RESERVED
Filing Party: Taniya Abron (Plaintiff)	Location: Rene C. Davidson Courthouse - Department 21
Date/Time: 06/23/2023 9:00 AM	Number of Motions: 1
Reservation ID: 269846710090	Confirmation Code: CR-OQUYRNJZTFKVVRHCA

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	0.00	1	0.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount: \$1.00	Type: Visa
Account Number: XXXX6358	Authorization: 03441D
Payment Date: 1969-12-31	

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