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Attorneys for Plaintiffs
AARON HALLUM and AMY RAMOS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

AARON HALLUM and AMY RAMOS, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

FCA US, LLC, doing business as FIAT
CHRYSLER AUTOMOBILES, a Delaware
Corporation; and DOES 1-50, inclusive,

Defendants.

AND CONSOLIDATED ACTIONS.

Case No. CIVDS1936782

Assigned to: Hon. Joseph T. Ortiz
Dept.: S17

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

Date: January 22, 2024
Time: 1:30 p.m.
Dept.: S-17

Complaint Filed: December 5, 2019
CMC: January 22, 2024
Trial: Not Set

1 I, Christina M. Lucio, declare as follows:

2 1. I am an attorney at law licensed to practice before the Courts of the State of
3 California and before this Court. I am Of Counsel to the law firm of James Hawkins, APLC. We,
4 along with co-counsel Haines Law Group APC (“collectively “Class Counsel”) are the attorneys
5 of record for Plaintiffs AARON HALLUM and AMY RAMOS (“Plaintiff(s)” or “Class
6 Representative(s)”) in this action. James Hawkins APLC, along with co-counsel Haines Law
7 Group APC (“collectively “Class Counsel”) are the attorneys of record for Plaintiffs AARON
8 HALLUM and AMY RAMOS (“Plaintiff(s)” or “Class Representative(s)”) in this action. I have
9 personal knowledge of the facts set forth below, and if called to testify regarding them, I could and
10 would do so competently.

11 2. I submit this Declaration in support of Plaintiffs’ Motion for Preliminary Approval
12 of Class Action Settlement (the “Preliminary Approval Motion”), which is filed concurrently
13 herewith, along with the Memorandum of Points and Authorities.

14 1. I am an attorney at law licensed to practice before the Courts of the State of
15 California and before this Court.

16 2. As more fully set forth in the Declaration of Matthew Moen (and incorporated
17 herein by reference), I respectfully submit that the Settlement reached between Plaintiffs and the
18 Defendant is fair, reasonable and adequate, and in the best interests of the Class.

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

28 4. Since I was admitted to practice law, I have litigated a wide variety of matters on

1 both the plaintiff and defense side. Much of my early experience involved the litigation of general
2 business and labor & employment matters on an individual and class-wide basis. I assisted with
3 the representation of both employers and employees in various capacities, and assisted employers
4 on issues related to compliance with employment laws.

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

10 6. Since 2015, I have also been Of Counsel to the law firm of James Hawkins APLC.

11 7. I am currently litigating at least thirty other putative class actions in State and
12 Federal courts in the state of California with the Hawkins firm.

13 8. I was lead trial counsel in a federal court jury trial in a wage and hour class action
14 which eventually settled prior to judgment. *Vigueras v. Red Robin Int'l*, No. SACV 17-1422 JVS
15 (DFMx), 2020 U.S. Dist. LEXIS 262135 (C.D. Cal. Dec. 2, 2020).

16 9. I have successfully litigated dozens of class actions with James Hawkins APLC as
17 one of the counsels of record, including without limitation:

- 18 a. *Smith v. Space Exploration Technologies Corp.*, Los Angeles Superior Court, Case
19 No. BC55429;
- 20 b. *Placencia v. Amcor Packaging Distribution, Inc.*, Orange County Superior Court,
21 Case No. 30-2013-00694012-CU-OE-CXC;
- 22 c. *Trani v. Lisi Aerospace, et al.*, Los Angeles Superior Court, Case No. BC495527;
- 23 d. *Galvan v. Goodwin Co.*, Orange County Superior Court, Case No. 30-2013-
24 00637062-CU-OE-CXC;
- 25 e. *Reyes v. Bristol Fiberlite*, Orange County Superior Court, Case No. 30-2013-
26 00653425-CU-OE-CXC;
- 27 f. *Gutierrez v. HMT Tank*, USDC Central Dist., Case No. CV14-1967-CAS(MANx);
- 28 g. *Williams v. Il Fornaio America Corp.*, Sacramento County, 34-2011-0009616;

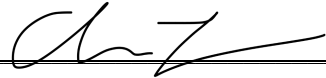
- 1 h. *Aguilar v. 7-Eleven, Inc.*, Orange County, Case No. 30-2009-002687141-CU-OE-
2 CXC;
- 3 i. *Madrigal v. Huntington Beach Market Broiler, Inc.*, Orange County, Case No. 30-
4 2012-00611260;
- 5 j. *Vang v. Jazz Semiconductor, Inc.*, Orange County, Case no. 30-2011-00460278;
- 6 k. *Vigueras v. Red Robin, Intl.*, C.D. Cal. Case No. 8:17-cv-01422-JVS (DFMx);
- 7 l. *Mendez v. Liberty Glass Fabricators, Inc.*, Riverside County Case No.
8 RIC1800119;
- 9 m. *Aguilar v. LDI Mechanical, Inc.*, Riverside County Case No. RIC1610019.
- 10 n. *Attia v. Neiman Marcus Group, Inc.*, United States District Court for the Central
11 District of California Case No. 8:16-cv-001504-DOC-FFM
- 12 o. *Payne v. Marriott Ownership Resorts, Inc.*, San Diego County Case No. 37-2018-
13 00015175-CU-OE-CTL.

14 10. Based on our experience, we consider ourselves experienced and qualified to
15 evaluate the claims and viability of the defenses. Based on the history of this case and given our
16 firm's extensive experience as class and representative action employment and wage and hour
17 litigators, it is our view that the settlement is fair, reasonable, and adequate, and in the best interest
18 of the Class Members.

19 11. I have no conflicts of interest with the class or with the Class Representative. I am
20 not related to any representative Plaintiff. I have not previously represented Defendant in any
21 matter. In sum, I am well-suited to act as Class Counsel and will continue to vigorously represent
22 the interests of the Class.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct.

3 Executed on this 21st day of December 2023 at Encinitas, California.

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6 Christina M. Lucio, Esq.
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