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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE 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.

Case No. CIVDS1936782

*[Case assigned for all purposes to the Hon.
Joseph T. Ortiz, Dept. S17]*

**DECLARATION OF PLAINTIFF AMY
RAMOS IN SUPPORT OF APPROVAL
OF CLASS ACTION SETTLEMENT**

Date: January 22, 2024

Time: 1:30 p.m.

Dept.: S17

Action Filed: December 5, 2019

Trial Date: None Set

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I, AMY RAMOS, declare as follows:

1. I am an individual over the age of 18 and one of the named plaintiffs in this case. This declaration is submitted in support of approval of the proposed class action settlement (“Settlement”) reached in this case. I have personal knowledge of the facts stated in this declaration and could testify competently to them if called upon to do so.

2. I worked for FCA US, LLC (“Defendant”) as a non-exempt employee from approximately November or December 2019 to approximately November 20, 2020, at Defendant’s warehouse in Ontario, California. Throughout my employment with Defendant, my job duties consisted of picking and sorting parts, as well as loading parts onto trailers.

3. Throughout my employment with Defendant, I was required to swipe my employee badge to pass through a turnstile in order to enter or exit Defendant's facility. Doing so acted as a timeclock, tracking my clock-in and clock-out times to the minute. However, Defendant did not pay me for all of my time on the clock, instead rounding my hours in quarter-hour increments. Further, during the COVID-19 pandemic, I was required by Defendant to wait outside of the facility to undergo pre-shift temperature checks and complete a written questionnaire each day, which needed to be reviewed and approved by Defendant's security guard before I was able to enter through the turnstiles to clock-in for my shifts. Since this took place before I could clock in, I was not paid for this time. Moreover, throughout my employment with Defendant, I was only provided with up to one single meal period each workday, regardless of the length of my shift, even though my work shifts regularly exceeded 10 hours in length. I was also regularly provided with my first meal periods after I had completed more than five hours of work, either because management wanted certain jobs finished and told me I could not take my meal period until it was finished, or because pre-scheduled meal periods were occasionally staggered.

4. As stated above, in order to enter or exit Defendant's warehouse, I needed to have a badge and pass through a turnstile, which also acted as a timeclock. Therefore, in order to remain on the clock during my rest periods I could not leave Defendant's facility

1 because doing so would require me to pass through the turnstile, clocking me out. Further, the
2 wage statements that I received from Defendant did not include Defendant's address, the correct
3 number of overtime hours I worked, all of my rates of pay and corresponding hours worked for
4 certain pay line items including "Shift Premium" pay, "Actual Pay" and "Excess Pay", or the
5 start and end dates of the pay periods for which the wage statement was being issued.

6 5. On September 8, 2021, I filed a class action lawsuit against Defendant in San
7 Bernardino County Superior Court, entitled *Amy Ramos v. FCA US LLC*, Case No.
8 CIVSB2125996. I later learned that Aaron Hallum had filed this action shortly before I had filed
9 my lawsuit against Defendant, which asserts overlapping claims against Defendant. Therefore, I
10 agreed to join this lawsuit as a named plaintiff and dismiss my separate lawsuit in order to
11 proceed collectively.

12 6. When I first filed my lawsuit, I understood that it had the chance to benefit
13 Defendant's other workers by helping them recover money and penalties they were owed. I felt
14 that Defendant was not following the law, and I wanted Defendant to comply with the law and
15 treat its employees fairly. I feel that the other named plaintiff and I have taken on a greater
16 burden than any of the other class members because we have been actively involved in the
17 litigation, and because it is our names that are attached to the lawsuit. Although I was aware of
18 the risks associated with filing a public lawsuit, I chose to move forward with the case anyway.
19 Through my efforts, Defendant has agreed to a settlement that will benefit current and former
20 employees of Defendant, and I believe that I should be compensated for carrying the burden of
21 this litigation for the benefit of the other employees.

22 7. I have been actively involved in this case since before I first filed my separate
23 lawsuit. Among other things, I searched for and gathered relevant documents and provided them
24 to my attorneys for use in the lawsuit, I provided factual information to my attorneys, had
25 various phone calls with my attorneys to discuss the claims in the lawsuit and Defendant's
26 policies and practices, assisted my attorneys to help them prepare for mediation and spoke with
27 my attorneys during mediation to assist with factual disputes raised that day, discussed the
28 status of the case and general case strategy with my attorneys on many occasions, and otherwise

1 assisted my attorneys in moving this case towards resolution. I estimate that I have spent
2 approximately 20 to 25 hours in total on these activities.

3 I declare under penalty of perjury under the laws of the state of California and the
4 United States that the foregoing is true and correct. Executed on November 15, 2023 at
5 _____, California.

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Amy Ramos (Nov 15, 2023 06:03 PST)

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