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Attorneys for Plaintiff JULIO C. ROVIRA, LORENA RENTERIA, AND VIRGILIO SANTOS,
on behalf of themselves and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

JULIO C. ROVIRA, individually and on
behalf of himself and all others similarly
situated,

Plaintiff,

v.

SILVERADO SENIOR LIVING
MANAGEMENT, INC., a Delaware
Corporation, and DOES 1-50, inclusive,

Defendants.

Case No. 30-2020-01136565-CU-OE-CXC

CLASS ACTION

Assigned for All Purposes To:

Hon. Glenda Sanders

Dept.: CX-101

**DECLARATION OF CHRISTINA M.
LUCIO IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT, APPROVAL OF
CLASS NOTICE, AND CONDITIONAL
CERTIFICATION OF SETTLEMENT
CLASS**

Date: March 4, 2022

Time: 1:30 p.m.

Dept: CX-101

[Filed Concurrently with Notice of Motion and
Motion; Memorandum of Points and
Authorities; Declaration of James R. Hawkins;
and Proposed Order]

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

2 1. I am an individual over the age of 18. I am of Counsel to the Law Firm of James
3 Hawkins, APLC. I am one of the attorneys of record for Plaintiffs JULIO C. ROVIRA,
4 LORENA RENTERIA, and VIRGILIO SANTOS (“Plaintiffs” or “Class Representatives”), who
5 filed this Class Action on behalf of themselves and all other similarly situated current and former
6 hourly non-exempt employees, who did not execute an arbitration agreement related to their work
7 for Defendant Silverado Senior Living Management, Inc. (“Defendant” or “Silverado”) (with
8 Plaintiffs, the “Parties”). I have personal knowledge of the facts set forth below, and if called to
9 testify regarding them, I could and would do so competently.

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

14 3. Attached to the Declaration of James R. Hawkins **Exhibit A** is a true a correct
15 copy of the executed Class Action and PAGA Settlement Agreement entered by the parties,
16 including exhibits thereto, which the parties ask the Court to preliminarily approve (the
17 “Agreement” or “Settlement Agreement”). **Exhibit 1** to the Settlement Agreement consists of the
18 parties’ Notice of Proposed Class Action Settlement (“Notice”); **Exhibit 2** consists of the parties’
19 proposed Request for Exclusion form; **Exhibit 3** is the proposed Objection Form.

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

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

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

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

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

- 14 a. *Smith v. Space Exploration Technologies Corp.*, Los Angeles Superior Court, Case
15 No. BC55429;
- 16 b. *Placencia v. Amcor Packaging Distribution, Inc.*, Orange County Superior Court,
17 Case No. 30-2013-00694012-CU-OE-CXC;
- 18 c. *Trani v. Lisi Aerospace, et al.*, Los Angeles Superior Court, Case No. BC495527;
- 19 d. *Glavan v. Goodwin Co.*, Orange County Superior Court, Case No. 30-2013-
20 00637062-CU-OE-CXC;
- 21 e. *Reyes v. Bristol Fiberlite*, Orange County Superior Court, Case No. 30-2013-
22 006534250-CU-OE-CXC;
- 23 f. *Gutierrez v. HMT Tank*, USDC Central Dist., Case No. CV14-1967-CAS(MANx);
- 24 g. *Williams v. Il Fornaio America Corp.*, Sacramento County, 34-2011-009616;
- 25 h. *Aguilar v. 7-Eleven, Inc.*, Orange County, Case No. 30-2009-002687141-CU-OE-
26 CXC;
- 27 i. *Madrigal v. Huntington Beach Market Broiler, Inc.*, Orange County, Case No. 30-
28 2012-00611260;

- 1 j. *Vang v. Jazz Semiconductor, Inc.*, Orange County, Case No. 30-2011-00460278;
2 k. *Vigueras v. Red Robin, Intl.*, C.D. Cal. Case No. 8:17-cv-01422-JVS (DFMx);
3 l. *Mendez v. Liberty Glass Fabricators, Inc.*, Riverside County Case No.
4 RIC1800119;
5 m. *Aguilar v. LDI Mechanical, Inc.*, Riverside County Case No. RIC1610019.

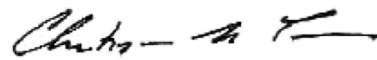
6 9. I am currently litigating at least thirty other wage and hour class and PAGA
7 actions in State and Federal courts in the state of California.

8 10. Based on our experience, we consider ourselves experienced and qualified to
9 evaluate the claims and viability of the defenses. Based on the history of this case and given our
10 firm's extensive experience as class and representative action employment and wage and hour
11 litigators, it is our view that the settlement is fair, reasonable, and adequate, and in the best
12 interest of the Class Members, as well as the State of California (as to the PAGA claims).

13 11. I have no conflicts of interest with the class or with the Class Representatives. I
14 am not related to any representative Plaintiffs. I have not previously represented Defendant in
15 any matter. In sum, I am well-suited to act as Class Counsel and will continue to vigorously
16 represent the interests of the Class.

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

19 Executed on this 18th day of November, 2021 at Encinitas, California.
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23 Christina M. Lucio, Esq.
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