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Attorneys for Plaintiff MARA SANTAMARIA, on
behalf of herself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

MARA SANTAMARIA, and on behalf of all
others similarly situated,

Plaintiffs,

v.

BRIGHT HORIZONS CHILDREN'S
CENTER, a Delaware Corporation; BRIGHT
HORIZONS FAMILY SOLUTIONS INC., a
Delaware Corporation, and DOES 1-10,
inclusive,

Defendants.

Case No.: CIVSB2210140

Assigned For All Purposes To:
Judge: Michael A. Sachs
Dept.: S28

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

Preliminary Approval Hearing: December 8, 2022
Time: 8:30 a.m.

Complaint Filed: May 17, 2022

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 Plaintiff MARA SANTAMARIA
4 (“Plaintiff” or “Class Representative”), who filed this Class Action on behalf of herself and all
5 others similarly situated current and former hourly non-exempt employees who have worked for
6 Defendants BRIGHT HORIZONS CHILDREN’S CENTER and BRIGHT HORIZONS FAMILY
7 SOLUTIONS INC (collectively “Defendants,”) (with Plaintiff, the “Parties”). I have been an
8 attorney on this case since its inception. I have personal knowledge of the facts set forth below,
9 and if called to testify regarding them, I could and would do so competently.
10

11 2. I submit this Declaration in support of Plaintiff’s Motion for Preliminary Approval
12 of Class Action Settlement, Approval of Class Notice, and Conditional Certification of Settlement
13 Class (the “Preliminary Approval Motion”), which is filed concurrently herewith, along with the
14 Memorandum of Points and Authorities. Attached to the Declaration of James R. Hawkins as
15 **Exhibit A** is a true and correct copy of the executed Class Action Settlement Agreement entered
16 by the Parties, including exhibits thereto, which the parties ask the Court to preliminarily approve
17 (the “Agreement” or “Settlement Agreement”). **Exhibit 1** to the Settlement Agreement consists
18 of the parties’ Notice of Proposed Class Action Settlement (“Notice”); **Exhibit 2** consists of the
19 Parties’ proposed Request for Exclusion form; **Exhibit 3** is the proposed Dispute Form.
20

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

1 4. 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 the litigation of
3 general business and labor & employment matters on an individual and class-wide basis. I
4 assisted with the representation of both employers and employees in various capacities, and
5 assisted employers on issues related to compliance with employment laws.

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

12 7. I have successfully litigated over dozens of class and PAGA actions with James
13 Hawkins APLC as one of the counsels of record, including without limitation:
14

- 15 a. *Smith v. Space Exploration Technologies Corp.*, Los Angeles Superior Court, Case
16 No. BC55429;
- 17 b. *Placencia v. Amcor Packaging Distribution, Inc.*, Orange County Superior Court,
18 Case No. 30-2013-00694012-CU-OE-CXC;
- 19 c. *Trani v. Lisi Aerospace, et al.*, Los Angeles Superior Court, Case No. BC495527;
- 20 d. *Galvan v. Goodwin Co.*, Orange County Superior Court, Case No. 30-2013-
21 00637062-CU-OE-CXC;
- 22 e. *Reyes v. Bristol Fiberlite*, Orange County Superior Court, Case No. 30-2013-
23 00653425-CU-OE-CXC;
- 24 f. *Gutierrez v. HMT Tank*, USDC Central Dist., Case No. CV14-1967-CAS(MANx);
- 25 g. *Williams v. Il Fornaio America Corp.*, Sacramento County, 34-2011-0009616;
- 26 h. *Aguilar v. 7-Eleven, Inc.*, Orange County, Case No. 30-2009-002687141-CU-OE-
27 CXC;
- 28

- 1 i. *Madrigal v. Huntington Beach Market Broiler, Inc.*, Orange County, Case No. 30-
2 2012-00611260;
3 j. *Vang v. Jazz Semiconductor, Inc.*, Orange County, Case no. 30-2011-00460278;
4 k. *Vigueras v. Red Robin, Intl.*, C.D. Cal. Case No. 8:17-cv-01422-JVS (DFMx);
5 l. *Mendez v. Liberty Glass Fabricators, Inc.*, Riverside County Case No.
6 RIC1800119;
7 m. *Aguilar v. LDI Mechanical, Inc.*, Riverside County Case No. RIC1610019.

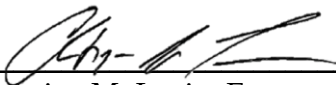
8
9 8. I am currently litigating at least forty other wage and hour class and PAGA actions
10 in State and Federal courts in the state of California.

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

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

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

22
23 Executed on this 14th day of November, 2022 at Encinitas, California.

24
25 
26 Christina M. Lucio, Esq.