



1875 Century Park East, Suite 1000
Los Angeles, California 90067
310.556.4811 Main | 310.943.0396 Fax

ARIANNA EGUILUZ
310.712.8142 Direct
Arianna.Eguiluz@capstonelawyers.com

March 3, 2025

VIA ONLINE SUBMISSION

California Labor & Workforce Development Agency
ATTN: PAGA Administrator
(<https://dir.govfa.net/310>)

Subject: *Mario Marin v. Lucid Group USA, Inc., et al.*
LWDA Case No. LWDA-CM-1083339-25- AMENDED NOTICE

Dear PAGA Administrator:

This office represents Mario Marin in connection with his claims under the California Labor Code. Mr. Marin was an employee of LUCID GROUP USA, INC.; LUCID GROUP, INC.; LUCID GROUP TECHNOLOGIES, LLC; and/or LUCID USA, INC. For the purpose of this letter, Mr. Marin collectively refers to these entities as "LUCID."

We previously provided notice of Mr. Marin's claims to the California Labor and Workforce Development Agency ("LWDA") on February 28, 2025, and submitted the applicable filing fee pursuant to Labor Code section 2699.3(a)(1)(B). This amended notice supplements Mr. Marin's prior LWDA notice and adds an additional claim.

The employers may be contacted directly at the addresses below:

LUCID GROUP USA, INC.
7373 GATEWAY BLVD.
NEWARK, CA 94560

LUCID GROUP, INC.
7373 GATEWAY BLVD.
NEWARK, CA 94560

LUCID GROUP TECHNOLOGIES, LLC
7373 GATEWAY BLVD.
NEWARK, CA 94560-1149

LUCID USA, INC.
7373 GATEWAY BLVD.
NEWARK, CA 94560

Mr. Marin intends to seek civil penalties, attorneys' fees, costs, and other available relief for violations of the California Labor Code, which are recoverable under sections 2698, *et seq.*, the Labor Code Private Attorneys General Act of 2004 ("PAGA"). Mr. Marin seeks relief on behalf of himself, the State of California, and other persons who are or were employed by LUCID as a non-exempt, hourly paid employee in California and who received at least one wage statement ("aggrieved employees"). This letter is sent in compliance with the notice and reporting requirements of California Labor Code section 2699.3.

LUCID employed Mr. Marin as an hourly paid, non-exempt employee from approximately August to November 2024. Mr. Marin worked for LUCID as an Associate Service Technician out of its facility in Millbrae, California. During his employment, Mr. Marin typically worked eight (8) hours or more per day and five (5) days per week. At the time Mr. Marin's employment with LUCID ended, he earned approximately \$35.00 per hour. Mr. Marin's primary job duties included, without limitation, processing new vehicles coming off the production line, conducting pre-delivery inspections, and preparing vehicles for delivery to customers.

LUCID committed each of the following Labor Code violations against Mr. Marin, the facts and theories of which follow, making him an "aggrieved employee" pursuant to California Labor Code section 2699(c)(1):¹

Violation of California Labor Code §§ 6401 and 6403 – Failure to Provide Safety Devices and Safeguards

California Labor Code section 6401 provides that employers must furnish and use safety devices and safeguards, and adopt and use practices, means, methods, operations, and processes which are reasonably adequate to render the employment and place of employment safe and healthy. California Labor Code Section 6401 further provides that an employer must do everything reasonably necessary to protect the life, safety and health of its employees. California Labor Code section 6403(a) requires that employers provide and use safety devices and safeguards reasonably adequate to render the employment and place of employment safe.

During the relevant time period, LUCID failed to provide Mr. Marin and other aggrieved employees with personal protective equipment, such as steel-toed safety boots, to keep them safe in the workplace. Despite the fact that LUCID required Mr. Marin and other aggrieved employees to wear certain personal protective equipment, including steel-toed safety boots, while engaged in their work-related duties, LUCID failed to provide such reasonably necessary equipment to Mr. Marin and other aggrieved employees to keep them safe. Thus, LUCID's failure to provide Mr. Marin and other aggrieved employees with safety devices and safeguards for the workplace violates California Labor Code sections 6401 and 6403.

Mr. Marin and other aggrieved employees are entitled to recover civil penalties, attorneys' fees, costs, and interest thereon, and seek injunctive relief to bring LUCID into compliance with Labor Code sections 6401 and 6403, pursuant to Labor Code sections 2699(a), (f), and (k).

Accordingly, pursuant to PAGA, and in particular California Labor Code sections 1194.5, 2699(a), 2699(k), 2699.3(a)-(c), and 2699.5, Mr. Marin, acting in the public interest as a private attorney general, seeks assessment and collection of civil penalties and injunctive relief for himself, all other

¹ These facts, theories, and claims are based on Mr. Marin's experience and counsel's review of those records currently available relating to Mr. Marin's employment. Discovery conducted in litigation of wage and hour claims such as these often reveals additional claims that the aggrieved employee was not initially aware of (because the aggrieved employee was not aware of the law's requirements, the employer misinformed its employee of the law's requirements, or because the employer effectively hid the violations). Thus, Mr. Marin reserves the right to supplement this letter with additional facts, theories, and claims if he becomes aware of them subsequent to the submission of this letter.

aggrieved employees, and the State of California against LUCID for violations of California Labor Code sections 6401 and 6403.

Thank you for your attention to this matter. If you have any questions, please contact me at the phone number or address below:

Ariana Eguiluz
Capstone Law APC
1875 Century Park East, Suite 1000
Los Angeles, CA 90067
(310) 712-8142

Best Regards,

A handwritten signature in black ink, appearing to read "Ariana Eguiluz". The signature is fluid and cursive, with the first name "Ariana" written in a larger, more prominent script than the last name "Eguiluz".

Arianna Eguiluz

Copy: LUCID GROUP USA, INC. (via U.S. Certified Mail); LUCID GROUP, INC. (via U.S. Certified Mail); LUCID GROUP TECHNOLOGIES, LLC (via U.S. Certified Mail); LUCID USA, INC. (via U.S. Certified Mail)

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Marin v. Lucid Corp.

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7373 GATEWAY BLVD.
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1875 Century Park East
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7373 GATEWAY BLVD.

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Lucid Grp.

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