

Neil M. Larsen Esq. (SBN 276490)
neil@abramsonlabor.com
Jennifer S. Rivera Esq. (SBN 353268)
jennifer.r@abramsonlabor.com
ABRAMSON LABOR GROUP
1700 W. Burbank Blvd.
Burbank, California 91506
Tel: (213) 493-6300
Fax: (213) 723-2522

D.LAW, INC.
Emil Davtyan (SBN 299363)
emil@d.law
David Yeremian (SBN 226337)
d.yeremian@d.law
David Keledjian (SBN 309135)
d.keledjian@d.law
David Arakelyan (SBN 337076)
d.arakelyan@d.law
450 N. Brand Blvd. Ste. 840
Glendale, CA 91203
Telephone: (818) 962-6465
Facsimile: (818) 962-6469

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

LISA CHILDRESS and JUSTIN AARON
HEARD, on behalf of themselves and all
others similarly situated,

Plaintiff,

vs.

FORD MOTOR COMPANY; and DOES 1
through 100, Inclusive,

Defendants.

Case No. CIVSB2324555

CLASS ACTION

*[Assigned for all purposes to the
Hon. Thomas S. Garza. Dept. S27]*

**DECLARATION OF LISA CHILDRESS
IN SUPPORT OF APPROVAL OF
CLASS ACTION AND PAGA ACTION
SETTLEMENT**

Action Filed: October 3, 2023
Trial Date: None Set

DECLARATION OF LISA CHILDRESS

I, LISA CHILDRESS, declare as follows:

1. I am an individual over the age of 18 and am the named plaintiff in this matter against FORD MOTOR COMPANY (“Ford” or “Defendant”). 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 am a former employee of Ford, where I worked as a non-exempt employee from approximately May 2019 through April 2023.

3. While working for Ford, I believe that I was not paid all of the minimum wages to which I was entitled, and that I did not receive all of my meal breaks or rest breaks. I also believe that I was not paid meal or rest period premium wages. I also believe that I was not reimbursed for the expenses I incurred during my employment including the cost of the use of my personal cell phone. As a result, I understand that I was not provided accurate wage statements and was not paid all wages owed to me at the end of my employment.

4. When I first discussed this case with my attorneys and agreed to move forward with this case, I understood that this lawsuit could benefit other Ford employees by helping to recover unpaid wages and other penalties. I knew that filing a lawsuit carries risk, including the risk of being responsible for Ford’s costs if the case were lost. But I accepted this risk because I wanted to vindicate my and other Ford employees’ rights. Even though I understood that filing a lawsuit is a public record, I accepted that burden in order to help other Ford employees.

5. I have been actively involved in this case since I first had discussions with my attorneys at Abramson Labor Group about a potential class action back in July 2023. I have had many discussions with my attorneys throughout this case to discuss Ford’s policies and practices, identify potentially helpful documents and witnesses, and discuss case strategy. I also spent significant time searching my own documents. I also spent time reviewing the Settlement Agreement with my attorneys. I estimate that I have spent at least 40-45 hours on this case from

1 the time I first spoke with my attorneys regarding this case until the present.

2 6. As part of the proposed Settlement, I understand that my attorneys will request
3 that the Court approve a service payment of \$10,000 for my efforts on behalf of the Settlement
4 Class. I believe this amount is reasonable based on the amount of time and effort I have devoted
5 to this case as well as the risks I have undertaken as the class representative, as well as for my
6 agreement to provide a full release of claims related to my employment with Ford that extends
7 beyond the release of claims applicable to other class members. My support of the Settlement is
8 not conditioned on my receipt of the requested service payment.

9 I declare under penalty of perjury under the laws of the state of California that the
10 foregoing is true and correct, and this declaration was executed by me on 11/18/2025.

11
12 
Lisa Childress (Nov 18, 2025 16:57:04 PST)
13 LISA CHILDRESS