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18 *Attorneys for Plaintiff Eric Bach*

19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**

21 ERIC BACH,

22 Plaintiff,

23 vs.

24 LUCID GROUP INC.,

25 Defendant.

Case No.

**COMPLAINT SEEKING
DAMAGES**

1. Discrimination in violation of 42 U.S.C. § 1981
2. Retaliation in violation of 42 U.S.C. § 1981
3. Wrongful termination in violation of public policy

DEMAND FOR JURY TRIAL

26
27
28 **COMPLAINT SEEKING DAMAGES**

1 Plaintiff Eric Bach (“Plaintiff” or “Bach”) hereby alleges, by and through his
2 undersigned counsel, Wigdor LLP and Robinson Markevitch & Parker LLP, as and
3 for his Complaint against Defendant Lucid Group Inc. (“Lucid,” the “Company” or
4 “Defendant”) as follows:

5 PRELIMINARY STATEMENT

6 1. Lucid is a pioneering electronic car company that has made
7 remarkable strides in electric vehicle (“EV”) engineering. Its Lucid Air sedan has
8 set the benchmark for EV efficiency, achieving over 500 miles of range on a single
9 charge. Lucid’s electrical architecture allows drivers to add hundreds of miles of
10 range in just minutes. Its innovations are so significant that other car makers are
11 licensing Lucid’s technology for their own vehicles.

12 2. As Lucid’s Senior Vice President of Product and Chief Engineer, Bach
13 was a big reason for Lucid’s achievements. And Lucid knows it. For a decade,
14 Lucid recognized Bach’s extraordinary performance by awarding him merit-based
15 salary increases, bonuses and equity worth millions of dollars. Most recently, the
16 Company granted Bach equity valued at \$9,000,000 in September 2024, a salary
17 increase in January 2025 and a substantial cash bonus in March 2025.

18 3. All that changed when Bach became the target of Lucid’s racist
19 Human Resources (“HR”) Department and complained about a hostile work
20 environment.

21 4. In early 2025, Lucid’s HR Department, led by Gale Halsey (“Halsey”)
22 and her second-in-command Rachel Rivera (“Rivera”), caused the Company to
23 strip significant responsibilities from Bach, claiming that Bach contributed to a
24 poor culture at the Company. In fact, Rivera had been disparaging Bach to the
25 Company’s employees, including by mocking Bach as a “German Nazi.” (Bach is
26 a German and British citizen, who grew up in Germany and speaks with a German
27

1 accent.) Lucid confirmed Rivera’s racist conduct, yet took no meaningful remedial
2 action, simply moving Rivera to a new role. Bach protested, telling Halsey that
3 Rivera should have been fired for creating a “hostile work environment.” Lucid
4 retaliated by firing Bach and publicly disparaging him.

5 ADMINISTRATIVE PREREQUISITES

6 5. Contemporaneous with the filing of this action, Bach will file
7 charge(s) with the Equal Employment Opportunity Commission (“EEOC”)
8 alleging violations of Title VII, 42 U.S.C. §§ 2000e *et seq.*, and the California Civil
9 Rights Department (“CRD”). Following the completion of the EEOC’s and CRD’s
10 investigations, Bach will assert and file Title VII and state-law claims against the
11 appropriate Defendants in an amended complaint.

12 6. Bach has complied with all other prerequisites to filing this action.

13 JURISDICTION AND VENUE

14 7. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343,
15 as this action asserts violations of 42 U.S.C. § 1981, *et seq.*, and therefore raises
16 federal questions regarding the deprivation of Plaintiff’s rights.

17 8. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this Court because
18 a substantial part of the events or omissions giving rise to this action occurred in
19 this District.

20 PARTIES

21 9. Plaintiff Eric Bach is an individual domiciled in San Francisco,
22 California.

23 10. Defendant Lucid Group Inc. is a corporation incorporated in the state
24 of Delaware and headquartered in California.

FACTUAL ALLEGATIONS

I. Bach's Successful Career at Lucid

11. Bach has been a successful engineer and leader in the automotive industry for more than two decades.

12. In 2015, Bach joined Lucid as a Senior Director of Body Engineering.

13. In 2018, Lucid promoted Bach to Vice President of Hardware Engineering.

14. In 2021, because of Bach's significant contributions to the business, Lucid again promoted Bach to Senior Vice President of Product and Chief Engineer. Lucid also identified Bach as one of its named executive officers ("NEO").

15. In this role, Bach had two Vice Presidents and four Directors reporting directly to him. He was responsible for overseeing all hardware engineering at the company, along with product management and corporate planning.

16. Thereafter, Lucid continued to recognize Bach's achievements by awarding him significant merit raises, bonuses and equity.

17. For instance, in 2022, Lucid granted Bach over \$5.2 million in equity.

18. In 2023, Lucid increased Bach's salary from \$488,942 to \$534,423, and awarded him an additional \$7.2 million in equity.

19. It also gave him a \$1 million special bonus for his years of work on Lucid Gravity, "a major technical, commercial, and design achievement for the Company."

20. In 2024, Lucid increased Bach's base salary from \$534,423 to \$605,000 because of, among other things, Bach's executive performance.

21. In September 2024, Lucid gave Bach an additional \$9 million in stock.

22. The trend continued into 2025, when Lucid again increased Bach's salary to \$626,000 and awarded him another \$591,000 cash bonus.

II. Lucid's Discriminatory "Investigation"

23. In late 2024 and continuing into early 2025, Lucid's HR department, led by Halsey and accompanied by Rivera, purported to launch an investigation into the Company's workplace culture.

24. The investigation, which, as explained below, Bach ultimately learned was tainted by HR's racist beliefs, initially resulted in Bach losing significant responsibilities.

25. For instance, Lucid stripped away Bach's responsibilities for the powertrain team, which accounted for approximately 40% of the organization. Bach was also excluded from Board preparations and Board Meetings. Lucid did not, however, terminate Bach's employment.

26. Bach did not agree with these adverse actions, especially given his decade-long history of recognized success with the Company. Indeed, several high-level Lucid executives continued to praise Bach.

27. For instance, Turqi Alnowaiser, Lucid's Chairman of the Board, praised Bach's loyalty and dedication to the Company and expressed a desire to continue working with Bach.

28. Andrew Liveris, a Lucid Board member, likewise signaled that Bach would become Chief Technology Officer (the position "is yours to lose") and that Bach could one day become Chief Executive Officer.

III. Bach Complains About a Hostile Work Environment

29. In or around mid-2025, Bach learned from a colleague that Rivera, the Senior Director of Human Resources and the HR person responsible for Bach's group, had been disparaging Bach in racist terms.

1 30. Rivera referred to Bach as a “German Nazi.”

2 31. Rivera made this comment to Bach’s colleagues.

3 32. Rivera intended the comment as an insult, stereotyping Bach based on
4 his race as a member of the Nazi Party that ruled Germany under Adolf Hitler.
5 (Bach is a German citizen and speaks with a German accent.)

6 33. Nazis are associated with genocide, ethnic hatred, racial supremacy
7 and violent militarism.

8 34. Bach found the racist insult abusive and humiliating, particularly
9 because Bach was raised in Germany where labeling someone a Nazi is considered
10 extremely serious.

11 35. Bach also felt threatened by the racist comment because it spread
12 from Lucid’s HR department, which had supervisory authority over Bach,
13 including the ability to discipline or terminate Bach’s employment.

14 36. Bach understood that he had been targeted by HR not because of his
15 performance (which had always been excellent as reflected in positive comments,
16 promotions and significant merit compensation) but because of his race.

17 37. Moreover, HR’s racist views of Bach impacted his work because, as
18 explained above, they resulted in Bach losing significant responsibilities and being
19 excluded from important meetings.

20 38. Upon information and belief, Gemma Parker (“Parker”), Vice
21 President of Program Management, participated in, and approved of, the racist
22 harassment. Indeed, Parker has admitted to Bach’s colleagues that she “hates”
23 Bach “so much” that her hate “comes out at [Bach’s] team members.”

24 39. Bach protested by advising the colleague who heard the comment to
25 report the racist conduct to the Company’s ombudsman, which is the typical path
26 for raising claims of discrimination.

1 40. After an investigation, Lucid confirmed that Rivera used the racist
2 slur.

3 41. Rather than take appropriate remedial action, however, Halsey sought
4 to protect Rivera.

5 42. Halsey told Bach that Rivera had been moved to a new role, making
6 her the Company's Senior Director of Talent Development & Culture, People
7 Operations, and the HR Institute, because she (Rivera) had made some negative
8 statements about Bach.

9 43. Halsey refused, however, to tell Bach that Rivera – who had
10 participated in a purported “investigation” of Bach – held racist views.

11 44. Bach knew that Halsey was being dishonest and hiding the truth. He
12 told Halsey that he knew Rivera called him a “German Nazi” and that Rivera
13 should have been fired for creating a “hostile work environment.”

14 45. Around the same time, Bach brought a complaint against Gemma
15 Parker for making various disparaging statements about Bach and his team to
16 others at Lucid. Displaying a clear animus towards Bach, Parker—who upon
17 information and belief, participated in and approved of the racist harassment—told
18 the company that Bach's “unprofessional behavior” was to blame.

19 46. As a result of yet another purported “investigation” by HR, Bach was
20 reprimanded with a written notice.

21 **IV. Lucid Fires Bach and Publicly Disparages Him**

22 47. On or about October 22, 2025, Lucid retaliated against Bach for his
23 protected activity by trying to force him to resign.

24 48. On October 24, 2025, Bach, through counsel, again protested that he
25 was the victim of discrimination and retaliation.

26 49. On November 5, 2025, less than two weeks later, Lucid fired Bach.

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50. On November 12, 2025, Lucid made negative public statements about Bach to *EV*, a business blog reporting on the electric vehicle industry. In an obvious effort to lash out at Bach because of his protected activity, Lucid falsely blamed Bach for production delays, significantly damaging his reputation.¹

51. In an attempt to hide its unlawful behavior, upon information and belief, Lucid requested that the publication not attribute the disparaging statements to any Lucid executive but, rather, to an anonymous “internal source.”

FIRST CAUSE OF ACTION

(Discrimination in Violation of 42 U.S.C. § 1981)

52. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

53. As described above, Defendant intentionally discriminated against Plaintiff on the basis of race in violation of Section 1981 when, among other things, it stripped significant responsibilities from Plaintiff, terminated his employment, created a hostile work environment and publicly disparaged him.

54. Defendant fostered, condoned, accepted, ratified and/or otherwise failed to prevent or remedy discriminatory conduct due to race.

55. As a direct and proximate result of Defendant’s unlawful discriminatory conduct in violation of Section 1981, Plaintiff suffered, and continues to suffer, economic damages, loss of opportunity, loss of reputation and mental anguish for which is entitled to an award of damages.

¹ Cláudio Afonso, Exclusive: Lucid’s Product Chief Ousted After Years of Misattributed Production Delays, EV (Nov. 12, 2025), <https://electric-vehicles.com/lucid/exclusive-lucids-product-ousted-after-years-of-misattributed-production-delays/>.

56. Defendant's unlawful discriminatory actions constitute reckless, malicious, willful and wanton violations of Section 1981 for which Plaintiff is entitled to an award of punitive damages.

SECOND CAUSE OF ACTION

(Retaliation in Violation of 42 U.S.C. § 1981)

57. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

58. As described above, Defendant retaliated against Plaintiff in violation of Section 1981 by demoting him, terminating his employment, subjecting him to abuse and harassment, and making negative public statements about Plaintiff.

59. As a direct and proximate result of the unlawful retaliatory conduct taken by Defendant in violation of Section 1981, Plaintiff has suffered, and continues to suffer, economic damages, loss of opportunity, loss of reputation and mental anguish for which he is entitled to an award of damages.

60. The unlawful retaliatory conduct taken by Defendant constitutes reckless, malicious, willful and wanton violations of Section 1981 for which Plaintiff is entitled to an award of punitive damages.

THIRD CAUSE OF ACTION

(Wrongful Termination in Violation of Public Policy)

61. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

62. At all relevant times, California's Fair Employment and Housing Act ("FEHA") clearly delineates a policy against race, national origin, and ancestry discrimination in employment. Cal. Gov. Code § 12921.

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63. As described herein, Defendant terminated Plaintiff's employment due to Plaintiff's race, national origin, and ancestry, in violation of FEHA. Cal. Gov. Code § 12900 *et seq.*

64. As further alleged herein, Defendant terminated Plaintiff's employment after he made protected complaints about discrimination, in violation of FEHA. Cal. Gov. Code § 12900, *et seq.*

65. As a direct and proximate result of the unlawful discriminatory and retaliatory conduct taken by Defendant in violation of public policy, Plaintiff has suffered, and continues to suffer, economic damages, loss of opportunity, loss of reputation and mental anguish for which he is entitled to an award of damages.

66. The unlawful discriminatory and retaliatory conduct taken by Defendants constitutes reckless, malicious, willful and wanton violations for which Plaintiff is entitled to an award of punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays judgment be entered in his favor against Defendant as follows:

A. For a money judgment representing compensatory damages including consequential damages, lost wages, earning, and all other sums of money, together with interest on these amounts, according to proof;

B. For a money judgment for mental pain and anguish and severe emotional distress, according to proof;

C. For punitive and exemplary damages according to proof;

D. For attorneys' fees and costs;

E. For prejudgment and post-judgment interest; and

F. For such other and further relief as the Court may deem just and proper.

JURY DEMAND


Plaintiff hereby demands a trial by jury on all issues of fact and damages stated herein.

Dated: December 4, 2025

Respectfully submitted,

WIGDOR LLP

By:


Valdi Licul
(pro hac vice to be filed)
Katherine Vask
(pro hac vice to be filed)

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for the

ERIC BACH

Plaintiff(s)

y.

LUCID GROUP INC.

Defendant(s)

Civil Action No.

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: