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Attorneys for Plaintiff BRANDY L. SKUTLEY,
on behalf of herself and all others similarly situated

[Additional Counsel on Following Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF YOLO

BRANDY L. SKUTLEY and TIMOTHY
MILLER, on behalf of themselves and all
others similarly situated,

Plaintiff,

v.

WALGREEN CO., an Illinois
Corporation, WALGREENS BOOTS
ALLIANCE, INC., an Illinois
Corporation, and DOES 1-50, inclusive,

Defendants.

Case No. CV2023-0740

Assigned for All Purposes to:
Hon. Timothy L. Fall

**DECLARATION OF BRANDY L. SKUTLEY
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF
STIPULATION OF CLASS ACTION AND
REPRESENTATIVE ACTION
SETTLEMENT AND RELEASE OF CLAIMS**

Date: April 30, 2025
Time: 9:00 a.m.
Dept: 11

Complaint Filed: April 10, 2023
FAC Filed: October 10, 2024
Trial Date: None Set

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Attorneys for Plaintiff TIMOTHY MILLER,
on behalf of himself and all others similarly situated

1 I, Brandy L. Skutley, declare as follows:

2 1. I am a named plaintiff in this action. I have personal knowledge of all facts in this
3 declaration and, if asked, I would testify to these facts under oath in court.

4 2. I was an employee for Defendant Walgreen Co. (“Defendant” or “Walgreens”)
5 from approximately January 2022 through April 2022 in Woodland, California. During my
6 employer, I worked as an Order Picker and was paid on an hourly basis.

7 3. I believe that when I was employed by Defendant, I was not paid for all hours that
8 I worked, including overtime wages. I was not provided timely 30-minute, uninterrupted meal
9 periods and ten-minute uninterrupted rest periods. I also was not timely paid my wages during
10 employment or upon termination, and I was not provided accurate itemized wage statements.

11 4. Based on my observations and Defendants’ policies and procedures, I believe that
12 my experiences were typical of the other members of the Class during the relevant time.

13 5. After meeting with my attorneys about these issues, I decided to proceed with a
14 lawsuit against my former employer. At the time, I also agreed to seek to bring my claims as a
15 class action and to represent all others who were similarly situated, and to obtain relief for the
16 entire class. I also agreed to consider the interest of the class just as I would consider my own
17 interest.

18 6. When I agreed to represent the Class, I understood it was my duty to be readily
19 available and to participate actively in the case. I knew that I needed to keep aware of the status
20 and progress of the lawsuit, and assist my attorneys in litigating the case on behalf of the Class.
21 At all times, I worked to fulfill these duties on behalf of the Class.

22 7. I also understood the risks I could face due to my involvement as a named
23 plaintiff. I understood that I could be held responsible for the payment of Defendants’ court-
24 awarded litigation costs and potentially attorneys’ fees if I did not prevail in the litigation.
25 Therefore, I realized that I was taking a significant amount of risk in filing the class action
26 lawsuit.

27 8. I knew that my name could easily be located on a search of court records and that
28 any prospective employer may find out that I had sued my former employer.

1 9. Even though I knew I was taking risks, I knew I had to do what I believed was
2 right and pursue claims on behalf of other employees to vindicate our rights and attempt to
3 recover the wages owed to us.

4 10. My attorneys prepared and forwarded me a copy of the complaint in this case that
5 would be filed on my behalf. I thoroughly reviewed the complaint and discussed the contents of
6 the complaint with my attorneys.

7 11. My attorneys prepared and forwarded me a copy of a notice to be sent to the Labor
8 and Workforce Development Agency (“LWDA”) on my behalf, setting forth additional claims
9 that I raised relating to my employment with Walgreens.

10 12. On March 13, 2023, my attorneys submitted notice to the LWDA on my behalf,
11 based on the claims asserted in my class complaint. I also asserted additional claims for failure to
12 pay sick leave, failure to pay COVID-19 supplemental sick leave, and conducted unlawful
13 background and credit checks on employees.

14 13. On April 10, 2023 my attorneys filed my class complaint, *Skutley v. Walgreen Co.,*
15 *et al.*, Case No. CV2023-0740, asserting causes of action for Defendant’s (1) failure to pay
16 minimum wages; (2) failure to pay overtime owed; (3) failure to provide lawful meal periods; (4)
17 failure to authorize and permit rest periods; (5) failure to timely pay wages during employment;
18 (6) failure to timely pay wages owed upon separation from employment; (7) knowing and
19 intentional failure to comply with itemized wage statement provisions; and (8) violation of the
20 unfair competition law.

21 14. On May 19, 2023 my attorneys filed an PAGA complaint seeking penalties under
22 Labor Code section 2698 et seq. (“PAGA”) for the alleged violations from the aforementioned
23 class complaint and letter to the LWDA.

24 15. I spent a substantial amount of time and effort pursuing my claims and the claims
25 of the other similarly situated employees from the time I retained my attorneys to this date.

26 16. During this litigation, I have spent hours on telephone calls discussing the facts of
27 my case with the attorneys of James Hawkins APLC and their staff. I spent hours discussing the
28 facts related to my employment with Defendants, including discussing my job duties and

responsibilities at Walgreens as an order picker, and the hours and days I worked. I have also worked to identify witnesses and assist my attorneys in moving this case forward.

17. I also spent hours looking for all documents related to my employment with Defendants and sending them to my attorneys, which included wage statements, personnel documents, emails, and separation paperwork. I further spent several hours on telephone calls discussing the documents I provided to my attorneys. I have also reviewed certain documents produced during the information exchange process in this case to assist my attorneys in prosecuting this case and ultimately preparing for mediation. I also remained available during the mediation to address any questions or issues that arose from my attorneys during the mediation, and I kept apprised of the follow up negotiations.

18. My attorneys provided me with a copy of the proposed Stipulation of Class and Representative Action Settlement and Release of Claims ("Settlement"), which I reviewed carefully before signing. I discussed the terms and any questions I had with my counsel. As a term of the settlement, I have agreed to give a broad release of all claims that I had or might have against Defendants arising from my employment. No other Class Member is required to give such as release, but I understand this is sometimes asked of class representatives.

19. It is my opinion that the proposed settlement in this case is fair, adequate and reasonable.

20. I understand that numerous other current and former employees of Defendants will receive payments they would not otherwise have recovered but for the initiation of the case.

21. I do not have any conflicting interests with the class, and I have always considered the interests of the class just as I would consider my own interest and placed the interests of the class above my own since I started the case. In addition, I believe I have put myself at risk by pursuing this lawsuit on behalf of myself and other current and former employees of Defendants, and I understand that my participation in this lawsuit could inhabit my ability to seek gainful employment in the future.

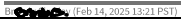
22. I am requesting the Court approve a \$10,000 Enhancement Payment. I gave a broad release of all claims against Defendants arising from my employment that other Class

1 Members did not have to give. In addition, I believe that the services that I provided to the Class
2 to achieve this excellent Settlement justify the award. I believe this amount is reasonable
3 considering the amount of work and time I spent with my attorneys to achieve this excellent
4 settlement. The time and service I provided to the Class resulted in the parties agreeing to
5 settlement the case and a positive outcome for the entire Class, who will receive a share of the
6 settlement funds in this case.

7 23. I further believe the amount of the Enhancement Payment is very reasonable
8 considering the financial and professional risks I took by bringing a class action lawsuit against
9 my former employer, including the potential of paying court-awarded litigation costs to
10 Defendants and the negative exposure to future employers.

11 24. As I have been since the inception of his lawsuit, I am committed to this case and
12 intend to continue to participate as needed until the conclusion of this matter for the benefit of the
13 Class.

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct. Executed on February 13, 2025 in Yuba City, California.

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18  (Feb 14, 2025 13:21 PST)

19 Brandy L. Skutley
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PROOF OF SERVICE

I am a resident of the State of California, County of Orange. I am over the age of eighteen years and not a party to the within action. My business address is 9880 Research Drive., Suite 200, Irvine, California 92618.

On February 14, 2025, I served on the interested parties in this action the following document(s) entitled:

- DECLARATION OF BRANDY L. SKUTLEY IN SUPPORT OF
PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF
STIPULATION OF CLASS ACTION AND REPRESENTATIVE ACTION
SETTLEMENT AND RELEASE OF CLAIMS

[XX] BY ELECTRONIC SERVICE: Based on a court Order or an agreement by the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from the email address citlalli@jameshawkinsaplc.com to the persons at the e-mail addresses listed in the Service List below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

SEE SERVICE LIST BELOW

[X] STATE: I declare under penalty of perjury, under the laws of the State of California, that the above is true and correct.

Executed on February 14, 2025, at Irvine, California.


Citlalli Gutierrez

SERVICE LIST

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