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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

**NOTICE OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF
STIPULATION OF CLASS 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

MATERN LAW GROUP, PC

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

1 **TO ALL PARTIES HEREIN AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on April 30, 2025, at 9:00 a.m. in Department 11 of the
3 Superior Court of California, County of Yolo, located at 1000 Main Street, Woodland, CA 95695
4 before the Hon. Timothy L. Fall, or as soon thereafter as this matter can be heard, Plaintiffs
5 Brandy L. Skutley and Timothy Miller (“Plaintiffs”) will and hereby do move this Court for an
6 order:

7 1. Granting preliminary approval of the Stipulation of Class and Representative
8 Action Settlement and Release of Claims (“Settlement Agreement”) between Plaintiffs and
9 Defendants Walgreen Co. and Walgreen Boot Alliance, Inc. (“Defendants”) (collectively, the
10 “Parties”), attached as **Exhibit 1** to the Declaration of James R. Hawkins in Support of Motion
11 for Preliminary Approval;

12 2. Pursuant to California Code of Civil Procedure Section 382, and solely for
13 purposes of approval of the Settlement Agreement, conditionally certifying the Class as defined
14 in the Settlement Agreement;

15 3. Approving James R. Hawkins, Christina M. Lucio, and Mitchell J. Murray of
16 James Hawkins, APLC and Matthew Matern and Mikael Stahle of Matern Law Group, PC as
17 Class Counsel;

18 4. Approving Plaintiffs Brandy L. Skutley and Timothy Miller as the Class
19 Representatives;

20 5. Finding the Parties’ proposed Notice of Class and Representative Action
21 Settlement (“Class Notice”), attached as Exhibit 1 to the Settlement Agreement, is the best
22 means practicable of providing notice under the circumstances and when completed according to
23 the terms of the Settlement Agreement shall constitute due and sufficient notice of this Action,
24 the Settlement, and the Final Approval Hearing to all person affected by and/or authorized to
25 participate in the Settlement in full compliance with California Rule of Court 3.769, California
26 Code of Civil Procedure Section 382, and the requirement of due process;

27 6. Approving the form and content of the proposed Class Notice, and establishing a
28 schedule for the dissemination of the Class Notice to Class Members as well as the deadlines for
Class Members to object to or opt out in connection with the Settlement;

- 1 7. Approving CPT Group, Inc. as the Settlement Administrator in this matter;
- 2 8. Granting the Preliminary Approval Order substantially in the form of the
- 3 proposed order submitted herewith;
- 4 9. Scheduling a hearing on final approval of the Settlement Agreement at which
- 5 Class Members may be heard, to determine all necessary matters concerning the Settlement,
- 6 including whether the Settlement is fair, adequate, and reasonable, whether this Court should
- 7 grant final approval, whether to grant Class Counsel's application for an award of fees and costs,
- 8 and whether to grant Plaintiffs' application for Enhancement Payments.

9 This Motion is brought pursuant to California Rule of Court 3.769 and California Code of

10 Civil Procedure Section 382, and is based on this Notice of Motion and Motion for Preliminary

11 Approval; the Memorandum of Points and Authorities in support of the Motion; the Declarations

12 of James R. Hawkins and Michael Stahle in Support of Motion for Preliminary Approval; the

13 Declarations of Plaintiffs Brandy Skutley and Timothy Miller in Support of the Motion for

14 Preliminary Approval; all documents currently on file in this action; the arguments of counsel;

15 and such other and further evidence as the Court may choose to entertain.

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17 Dated: April 4, 2025

JAMES HAWKINS APLC

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19 _____
James R. Hawkins
Christina M. Lucio
20 Mitchell J. Murray

21 Attorneys for Plaintiff Brandy Skutley, on behalf of
22 herself and all others similarly situated
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