

James R. Hawkins (SBN 192925)
Christina M. Lucio (SBN 253677)
Mitchell J. Murray (SBN 285691)
JAMES HAWKINS APLC
9880 Research Drive, Suite 200
Irvine, California 92618
Telephone: (949) 387-7200
Facsimile: (949) 387-6676
James@Jameshawkinsaplc.com
Christina@Jameshawkinsaplc.com

Attorneys for Plaintiffs

Norman B. Blumenthal, Bar No. 068687
Kyle R. Nordrehaug, Bar No. 205975
Aparajit Bhowmik, Bar No. 248066
Nicholas J. De Blouw, Bar No. 280922
BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858) 551-1223
Fax: (858) 551-1232

Attorneys for Plaintiffs

[Additional Counsel on the Following Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

Coordination Proceeding Special Title
(Rule 3.550)

TARGET WAGE AND HOUR CASES

Included Actions:

Medina et al. v. Target Corporation
San Bernardino Superior Court, Case No.
CIVSB2209126

Torres v. Target Corporation
Sacramento Superior Court, Case No. 34-
2022-00319715

Judicial Council Coordination Proceeding Case
No.: JCCP 5259

Assigned for All Purposes To:
Hon. Wilfred J. Schneider, Jr.
Dept.: S-32

PROOF OF SERVICE

Date: May 12, 2025
Time: 8:30 a.m.
Place: Department S-32

Complaint Filed: September 22, 2022
Trial Date: None Yet Set

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Matthew K. Moen (SBN 305956)
mmoen@haineslawgroup.com
Susan J. Perez (SBN 329044)
sperez@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Telephone: (424) 292-2350
Facsimile: (424) 292-2355

Attorneys for Plaintiffs

PROOF OF SERVICE, COUNTY OF ORANGE

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 April 8, 2025, I served on the interested parties in this action the following document(s) entitled:

**NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF
SUPPLEMENTAL CLASS ACTION AND PAGA SETTLEMENT AND NOTICE
PROCEDURES**

**-MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF SUPPLEMENTAL CLASS ACTION AND PAGA
SETTLEMENT**

**-DECLARATION OF JAMES R. HAWKINS IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**

**-[PROPOSED] ORDER GRANTING PRELIMINARY APPROVAL OF
SUPPLEMENTAL CLASS AND PRIVATE ATTORNEYS GENERAL ACT
SETTLEMENT AND NOTICE PROCEDURES**

[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 irma@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.

SERVICE LIST

PLEASE SEE PAGE ATTACHED

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

Executed on April 8, 2025, at Irvine, California.


IRMA CEJA

SERVICE LIST

Norman B. Blumenthal, Esq.
Kyle R. Nordrehaug, Esq.
Aparajit Bhowmik, Esq.
Nicholas J. De Blouw, Esq.
BLUMENTHAL NORDREHAUG
BHOWMIK DE BLOUW LLP
2255 Calle Clara
La Jolla, CA 92037
Tel: 858-551-1223
Fax: 858-551-1232
Norm@bamlawca.com
kyle@bamlawca.com
DeBlouw@bamlawca.com
Piya@bamlawca.com
Attorneys for Plaintiff

Paul K. Haines, Esq.
Fletcher W. Schmidt, Esq.
Matthew K. Moen, Esq.
Susan J. Perez, Esq.
HAINES LAW GROUP, APC
2155 Campus Dr., Suite 180
El Segundo, CA 90245
Tel: 4224-292-2350
Fax: 424-292-2355
phaines@haineslawgroup.com
fschmidt@haineslawgroup.com
mmoen@haineslawgroup.com
sperez@haineslawgroup.com
Attorneys for Plaintiff

Julie A. Dunne, Esq.
Matthew Riley, Esq.
Alberto Corona, Esq.
DLA PIPER LLP (US)
401 B Street, Suite 1700
San Diego, CA 92101
Tel: (619) 699-2700
Fax: (619) 699-2701
Julie.dunne@us.dlapiper.com
Matthew.riley@us.dlapiper.com
Alberto.corona@us.dlapiper.com

Attorneys for Defendant

California Labor and Workforce Development Agency
Attn: PAGA Administrator
1515 Clay Street, Ste. 801
Oakland, CA 94612
<http://www.dir.ca.gov/Private-Attorneys-General-Act>
(via website only)