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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

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

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

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

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Attorneys for Plaintiffs

1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 **PLEASE TAKE NOTICE** that on May 12, 2025, at 8:30 a.m., or as soon thereafter as
4 counsel may be heard, in Department S-32 of the above-captioned court, located at 247 West
5 Third Street, San Bernardino, California 92415-0210, the Honorable Wilfred J. Schneider, Jr.
6 presiding, Plaintiff Gustavo Medina (“Plaintiff”) will, and hereby does, move this Court to: (1)
7 preliminarily approve the “Supplemental Settlement” set forth in the Stipulation Regarding
8 Supplemental Class and Private Attorneys General Act Settlement and Release, attached as
9 **Exhibit 1** to the Declaration of James R. Hawkins; (2) conditionally certify the proposed
10 Supplemental Class for settlement purposes; (3) appoint Gustavo Medina as the Class
11 Representative for settlement purposes; (4) appoint James Hawkins APLC, Blumenthal
12 Nordrehaug Bhowmik De Blouw LLP, and Haines Law Group, APC as Class Counsel for
13 settlement purposes; (5) approve distribution of the proposed Notice of Pendency of a Class
14 Action Settlement to the Supplemental Class; (6) appoint Apex Class Action LLC as the
15 Settlement Administrator; and (7) set a hearing date for final approval of the Settlement. The
16 purpose of this Supplemental Settlement is to ensure that 156 individuals who were
17 inadvertently omitted from the Original Stipulation Regarding Supplemental Class and Private
18 Attorneys General Act Settlement and Release (the “Original Settlement”), granted final
19 approval on December 5, 2024, are provided with compensation on the same terms and
20 conditions as those in the Original Settlement.

21 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum
22 of Points and Authorities in support of Motion for Preliminary Approval of Supplemental Class
23 Action and PAGA Settlement; (3) the Declarations of James R. Hawkins, Kyle Nordrehaug, and
24 Paul Haines submitted in support of the Original Settlement; (4) the Declaration of James R.
25 Hawkins in Support of the Supplemental Settlement, (5) the Declarations of the Plaintiffs
26 submitted in Support of the Original Settlement, (6) the Stipulation Regarding Supplemental
27 Class and Private Attorneys General Act Settlement and Release, attached as Exhibit 1 to the

1 Declaration of James R. Hawkins in Support of the Supplemental Settlement; (7) the Notice of
2 Pendency of Supplemental Class Action Settlement; (8) the [Proposed] Order Granting
3 Preliminary Approval of Class Action Settlement; (9) the records, pleadings, and papers filed in
4 this action; and (10) upon such other documentary and oral evidence or argument as may be
5 presented to the Court at or prior to the hearing of this Motion. As this Motion is unopposed,
6 Plaintiffs respectfully request relief from the page limit requirement set by California Rules of
7 Court, Rule 3.1113(d).

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9 Dated: April 7, 2025

Respectfully submitted,

JAMES HAWKINS APLC

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12 By: 

James Hawkins
Christina Lucio
Mitchell Murray

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