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[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 CLASS
ACTION AND PAGA SETTLEMENT**

Date: July 3, 2024
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

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

PLEASE TAKE NOTICE that on July 3, 2024, at 8:30 a.m., or as soon thereafter as counsel may be heard, in Department S-32 of the above-captioned court, located at 247 West Third Street, San Bernardino, California 92415-0210, the Honorable Wilfred J. Schneider, Jr. presiding, Plaintiffs Gustavo Medina, Janira Perez, Sergio Garcia, Alicia Torres, Zachary Lomely, Angel Carter, Denise Cardenas, Brian Mena, Jimmy Perez, Emily Porcho, Sheemal Narayan, Juan Morales, Joaldi Gonzalez, and Martha Franco (collectively, “Plaintiffs”) will, and hereby do, move this Court to: (1) preliminarily approve the Settlement set forth in the Stipulation Regarding Class and Private Attorneys General Act Settlement and Release, attached as Exhibit 1 to the Declaration of James R. Hawkins; (2) conditionally certify the proposed Class for settlement purposes; (3) appoint Gustavo Medina, Janira Perez, Sergio Garcia, Alicia Torres, Zachary Lomely, Angel Carter, Denise Cardenas, Brian Mena, Jimmy Perez, Emily Porcho, Sheemal Narayan, Juan Morales, Joaldi Gonzalez, and Martha Franco as the Class Representatives for settlement purposes; (4) appoint James Hawkins APLC, Blumenthal Nordrehaug Bhowmik De Blouw LLP, and Haines Law Group, APC as Class Counsel for settlement purposes; (5) approve distribution of the proposed Notice of Pendency of a Class Action Settlement to the Class; (6) appoint Apex Class Action LLC as the Settlement Administrator; and (7) set a hearing date for final approval of the Settlement.

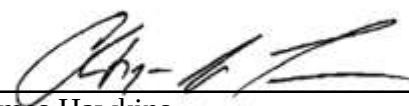
This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points and Authorities in support of Motion for Preliminary Approval of Class Action and PAGA Settlement; (3) the Declarations of James R. Hawkins, Kyle Nordrehaug, and Paul Haines; (4) the Stipulation Regarding Class and Private Attorneys General Act Settlement and Release, attached as Exhibit 1 to the Declaration of James R. Hawkins; (5) the Notice of Pendency of a Class Action Settlement; (6) the Declarations of Plaintiffs; (7) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement; (8) the records, pleadings, and papers filed in this action; and (9) upon such other documentary and oral evidence or

1 argument as may be presented to the Court at or prior to the hearing of this Motion. As this
2 Motion is unopposed, Plaintiffs respectfully request relief from the page limit requirement set
3 by California Rules of Court, Rule 3.1113(d).

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5 Dated: June 4, 2024

Respectfully submitted,

6 **JAMES HAWKINS APLC**

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8 By: 

James Hawkins
Christina Lucio
Mitchell Murray

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