

JAMES HAWKINS APLC

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Attorneys for SOVATANA SAUT and
JOHN HISATO NAKATANI individually
and on behalf of all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

SOVATANA SAUT and JOHN HISATO
NAKATANI, individually and on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

MCKESSON CORPORATION, a Delaware
Corporation; and DOES 1-50, inclusive,

Defendants.

Case No. 22STCV28690

Assigned for All Purposes to:
Hon. Maureen Duffy-Lewis
Dept.: 38

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT AGREEMENT,
APPROVAL OF NOTICE TO CLASS
MEMBERS, APPROVAL OF
SETTLEMENT ADMINISTRATOR,
AND SETTING HEARING FOR FINAL
APPROVAL OF SETTLEMENT**

Date: October 11, 2024
Time: 9:30 a.m.

Complaint Filed: September 1, 2022
FAC Filed: August 29, 2025
Trial Date: None Set

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on October 11, 2024 at 9:30 a.m. or as soon thereafter as the matter may be heard, in Department 38 of the Los Angeles County Superior Court at the Stanley Mosk Courthouse located at 111 North Hill Street, Los Angeles, CA 90012, before the Honorable Maureen Duffy-Lewis, Plaintiffs Sovatana Saut and John Nakatani (“Plaintiffs”), through their undersigned Class Counsel, will and hereby do move the Court for entry of the Order Granting Plaintiffs’ Motion for Preliminary Approval of the Class Action and PAGA Settlement Agreement filed concurrently herewith:

1. Provisionally certifying the following Class for purposes of settlement: all persons who are or were employed by Defendant McKesson Corporation (“Defendant”) as hourly paid, non-exempt employees who worked in distribution centers in the State of California at any time during the period from June 27, 2018 through April 7, 2024 (“Class Period”).

2. Preliminarily appointing Plaintiffs as Class Representatives for purposes of settlement only;

3. Appointing James Hawkins and Christina Lucio of James Hawkins, APLC as Class Counsel for purposes of settlement;

4. Preliminarily approving the class action portion of the Settlement as fair, adequate, and reasonable, and approving the PAGA portion of the settlement based upon the terms set forth in the Class Action and PAGA Settlement Agreement (the “Settlement”), including payment by Defendant of the non-reversionary Gross Settlement Amount of \$2,250,000.00;

5. Preliminarily approving payment of reasonable attorneys’ fees and costs from the Gross Settlement Amount in an amount of up to 35% of the Gross Settlement Amount (\$787,500), plus actual litigation costs up to \$50,000.00;

6. Preliminarily approving the Class Representatives’ Service Payments to Plaintiffs in an amount of up to \$10,000.00 each from the Gross Settlement Amount to compensate them for the burden, responsibility, time, effort, and risk involved in coming forward on behalf of the Class and for their general releases of claims broader than the Class release;

7. Approving payment to the LWDA of 75% of the \$112,500.00 allocated to PAGA penalties

1 (\$84,375.00) from the Gross Settlement Amount;

2 8. Preliminarily approving ILYM Group, Inc. as the Settlement Administrator and further
3 approving distribution of up to \$13,550.00 from the Gross Settlement Amount to cover the Settlement
4 Administrator's expenses in administering this Settlement;

5 9. Directing distribution to the Class of the Notice of Class Action and PAGA Settlement
6 (the "Class Notice"), including notice of the opportunity to exclude oneself from, or object to, the
7 Settlement (except for its PAGA component); and

8 10. Setting a date for a final fairness hearing to determine, following dissemination of Notice
9 to the Class, whether to grant final approval to the Settlement.

10 This Motion is based upon this Notice of Motion and Motion; the Memorandum of Points and
11 Authorities in Support thereof; the Declarations of James R. Hawkins, Esq., Christina M. Lucio, Esq.,
12 Sovatana Saut, John Nakatani and Anthony Rogers of ILYM Group, Inc. in support thereof; the Class
13 Action and PAGA Settlement Agreement; the Proposed Order Granting Motion for Preliminary Approval
14 of the Class Action and PAGA Settlement Agreement; the other records, pleadings, and papers filed in
15 this Action; and upon such other evidence or argument as may be presented to the Court at the hearing
16 of this Motion.

17 As this Motion is unopposed, Plaintiffs also respectfully request relief from the page limit
18 requirement set by California Rules of Court, Rule 3.1113(d).

19 Respectfully submitted,

20
21 **JAMES HAWKINS APLC**

22
23 Dated: September 3, 2024

24 By: 
James R. Hawkins, Esq.
Christina Lucio, Esq.

25 *Attorneys for Plaintiffs and the Putative Class*

26 4854-3918-8433, v. 1



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Make a Reservation

SOVATANA SAUT, INDIVIDUALLY AND ON BEHALF OF THEMSELVES AND ALL OTHERS
SIMILARLY SITUATED, et al. vs MCKESSON CORPORATION, A DELAWARE CORPORATION

Case Number: 22STCV28690 Case Type: Civil Unlimited Category: Other Employment Complaint Case
Date Filed: 2022-09-01 Location: Stanley Mosk Courthouse - Department 38

Reservation

Case Name:

SOVATANA SAUT, INDIVIDUALLY AND ON BEHALF
OF THEMSELVES AND ALL OTHERS SIMILARLY
SITUATED, et al. vs MCKESSON CORPORATION, A
DELAWARE CORPORATION

Case Number:

22STCV28690

Type:

Motion re: (Motion for Preliminary Approval)

Status:

RESERVED

Filing Party:

SOVATANA SAUT, individually and on behalf of
themselves and all others similarly situated (Plaintiff)

Location:

Stanley Mosk Courthouse - Department 38

Date/Time:

10/11/2024 9:30 AM

Number of Motions:

1

Reservation ID:

796399044398

Confirmation Code:

CR-CZ9L5GWZT8UFAMQSY

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	0.00	1	0.00

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