

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

**DECLARATION OF CHRISTINA M. LUCIO
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT, AND
MOTION FOR AWARD OF ATTORNEYS'
FEES, COSTS, AND CLASS
REPRESENTATIVE SERVICE PAYMENTS**

Date: July 14, 2025

Time: 9:30 a.m.

Dept.: 38

COMPLAINT FILED: SEPTEMBER 1, 2022

FAC FILED: AUGUST 29, 2025

Trial Date: None Set

1
2 I, Christina M. Lucio, declare as follows:

3 1. I am an individual over the age of 18. I am Of Counsel to the Law Firm of James
4 Hawkins, APLC. I am one of the attorneys of record for Plaintiffs Sovatana Saut and John
5 Nakatani ("Plaintiffs" or "Class Representatives"), who have filed this Class and PAGA Action
6 on behalf of themselves and the proposed settlement class (the "Class") and Aggrieved
7 Employees in the above-captioned matter against Defendant MCKESSON CORPORATION
8 ("Defendant" or "McKesson") (with Plaintiffs, the "Parties"). I have personal knowledge of the
9 facts set forth below, and if called to testify regarding them, I could and would do so competently.

10 2. I submit this Declaration in support of Plaintiffs' Motion for Final Approval of the
11 Class Action and PAGA Settlement, and Motion For Award of Attorneys' Fees, Costs, and Class
12 Representatives Service Payments, which are filed concurrently herewith, along with supporting
13 Memoranda of Points and Authorities.

14 3. Attached to the Declaration of James R. Hawkins as **Exhibit 1** is a true and correct
15 copy of the executed and preliminarily-approved Class Action and PAGA Settlement Agreement
16 entered by the parties, for which the parties ask the Court to grant final approval (the
17 "Settlement").

18 4. I have reviewed the Declarations of James R. Hawkins and Nathalie Beltran of
19 ILYM Group. I believe that the results of the notice administration process confirm the
20 determination that the Settlement is fair, reasonable and adequate and in the best interests of the
21 Plaintiffs and the Class Members. As such, I respectfully request that final approval is granted.

22 **EXPERIENCE**

23 25. I am an attorney at law licensed to practice before the Courts of the State of
24 California and before this Court.

25 26. In 2003, I graduated magna cum laude from the University of California, Riverside
26 with a Bachelor of Arts Degree. Following graduation, I attended the University of Southern
27 California, Gould School of Law (USC Law School). At various points during law school, I
28

1 worked with the USC Post-Conviction Justice Project, the Western Center for Disability Rights
2 and the Barrister's Domestic Violence Clinic. During the Summer of 2005, I was a law clerk for
3 the Law Offices of Bruce Austin (Safeco Insurance). In 2007, while a full-time law student, I
4 was also a Judicial Extern for the Honorable Sandra Ikuta, United States Court of Appeals, Ninth
5 Circuit. Thereafter, in 2007, I graduated from the USC Law School. The same year, I was
6 admitted to practice law in the State of California.

7 27. Since I was admitted to practice law, I have litigated a wide variety of matters on
8 both the plaintiff and defense side. Much of my early experience involved the litigation of
9 general business and labor & employment matters on an individual and class-wide basis. I
10 assisted with the representation of both employers and employees in various capacities, and
11 assisted employers on issues related to compliance with employment laws.

12 28. Since 2012, my work has largely been focused on individual employment
13 litigation and complex wage and hour class actions and representative action. In my practice as a
14 class action plaintiffs' attorney, I have been involved in litigating, mediating and settling
15 numerous wage and hour class actions dealing with class sizes ranging from several hundred to
16 over 18,000 class members. I have been involved in obtaining settlements ranging up to eight
17 figure settlements.

18 29. Since 2015, in addition to maintaining my own law practice, I have also been Of
19 Counsel to the law firm of James Hawkins APLC.

20 30. I have successfully litigated dozens of class and PAGA actions through Farnes &
21 Lucio, APC and with James Hawkins APLC, as one of the counsels of record. Each of the
22 following cases successfully resolved on a class-wide or PAGA basis. This is not an all-inclusive
23 list. My experience includes, without limitation:

- 24 ○ *Arteaga-Villagomez v. Insultech, LLC*, Orange County Superior Court Case No.
25 30-2012-00617802-CU-OE-CXC;
- 26 ○ *Quevedo v. Merical, Inc.*, Orange County Superior Court Case No. 30-2015-
27 00776171-CU-OE-CXC;
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- 1 ○ *Placencia v. Amcor Packaging Distribution, Inc.*, Orange County Superior Court
- 2 Case No. 30-2013-00694012-CU-OE-CXC;
- 3 ○ *Trani v. Lisi Aerospace, et al.*, Los Angeles Superior Court Case No. BC495527;
- 4 ○ *Galvan v. Goodwin Co.*, Orange County Superior Court Case No. 30-2013-
- 5 00637062-CU-OE-CXC;
- 6 ○ *Reyes v. Bristol Fiberlite*, Orange County Superior Court Case No. 30-2013-
- 7 00653425-CU-OE-CXC;
- 8 ○ *Gutierrez v. HMT Tank*, USDC Central Dist. Case No. CV14-1967-CAS(MANx);
- 9 ○ *Vigueras v. Red Robin International, Inc.*, USDC Central Dist. Case No. SACV 17-
- 10 1422 JVS (DFMx);
- 11 ○ *Smith v. Space Exploration Technologies Corp.*, Los Angeles Superior Court, Case
- 12 No. BC55429;
- 13 ○ *Williams v. Il Fornaio America Corp.*, Sacramento County Superior Court Case
- 14 No., 34-2011-0009616;
- 15 ○ *Aguilar v. 7-Eleven, Inc.*, Orange County Superior Court Case No. 30-2009-
- 16 002687141-CU-OE-CXC;
- 17 ○ *Madrigal v. Huntington Beach Market Broiler, Inc.*, Orange County Superior
- 18 Court Case No. 30-2012-00611260;
- 19 ○ *Vang v. Jazz Semiconductor, Inc.*, Orange County Superior Court Case No. 30-
- 20 2011-00460278;
- 21 ○ *Cano v. Financial Statement Services, Inc.*, Orange County Superior Court, Case
- 22 No. 30-2013-00653349-CU-OE-CXC;
- 23 ○ *Mendez v. Liberty Glass Fabricators, Inc.*, Riverside County Superior Court Case
- 24 No. RIC1800119;
- 25 ○ *Attia v. Neiman Marcus Group, Inc.*, United States District Court for the Central
- 26 District of California Case No. 8:16-cv-001504-DOC-FFM;
- 27 ○ *Dougan v. Healthy Living at Home*, San Diego Superior Court, Case No. 37-2020-
- 28

1 00018447-CU-OE-CTL;

2 ○ *Mauleon v. Hanken Cono Assad & Co.*, San Diego Superior Court, Case No. 37-
3 2020-00015364-CU-OE-CTL;

4 ○ *Johnson v. U.S. Bank National Association*, United States District Court for the
5 Southern District of California Case No. 19-CV-00286-JLS-LL;

6 ○ *McGrath v. Wyndham Resort Development*, United States District Court for the
7 Southern District of California Case No. 15-CV-1631-JM (KSC);

8 ○ *Ainsworth v. Sea Coast Hospice Care, Inc., et al.*, San Diego County Superior
9 Court Case No. 37-2020-00039584;

10 ○ *Payne v. Marriott Ownership Resorts, Inc.*, San Diego Superior Court Case No.
11 37-2018-0015175-CU-OE-CTL;

12 ○ *Keody v. Davis Trucking, LLC*, San Diego County Superior Court Case No. 37-
13 2014-00029149-CU-OE-CTL;

14 ○ *O'Brien, et al. v. Cerida Investment Corp.*, Santa Clara Superior Court Case No.
15 21CV384527;

16 ○ *Gonzalez v. Quality Aluminum Forge, LLC*, Orange County Superior Court Case
17 No. 30-2015-00817941;

18 ○ *Shay v. Apple, Inc.*, United States District Court for the Southern District of
19 California Case No. 3:20-cv-1629-JO-BLM;

20 ○ *Milligan v. CWI, Inc.*, San Bernardino Superior Court Case No. CIVDS 2013999;

21 ○ *Aguilar v. LDI Mechanical, Inc.*, Riverside County Case No. RIC1610019;

22 ○ *Abron v. University Healthcare Alliance*, Alameda County Superior Court Case No.
23 RG20066438;

24 ○ *Benson v. F21 Opco, LLC*, San Diego Superior Court Case No. 37-2021,00024619-
25 CU-OE-CTL;

26 ○ *Allen v. Creative Stone Mfg., Inc.*, San Bernardino County Superior Court Case No.
27 CIVSB2201498;
28

- 1 ○ *Santamaria v. Bright Horizons Children's Center*, San Bernardino County Superior
2 Court Case No. CIVSB2210140;
- 3 ○ *Yniguez v. Airgas USA, LLC*, Los Angeles County Superior Court Case No.
4 20STCV18190;
- 5 ○ *Cervantez v. Genuine Parts Company*, Los Angeles County Superior Court Case
6 No. 22STCV00981;
- 7 ○ *Robles v. Jetro Holdings, LLC*, San Diego Superior Court Case No. 37-2021-
8 00015414-CU-OE-CTL;
- 9 ○ *Hernandez v. Euromarket Designs, Inc.*, Santa Clara County Superior Court Case
10 No. 20CV3770922;
- 11 ○ *Ayala v. Veg-Land, et al.*, Orange County Superior Court Case No. 30-2014-
12 00738775-CU-OE-CXC;
- 13 ○ *Puente v. Sully-Miller Contracting Co.*, Orange County Superior Court Case No.
14 30-2015-00792088-CU-OE-CXC;
- 15 ○ *Garcia v. Revolution Foods, Inc.*, Los Angeles Superior Court Case No. BC579142;
- 16 ○ *Attaway, et al. v. Alliance Residential, LLC*, Santa Clara County Superior Court
17 Case No. 20CV365134;
- 18 ○ *Bowman v. Delta Dental of California*, Alameda County Superior Court Case No.
19 RG21108230;
- 20 ○ *Hernandez v. Burrtec Waste & Recycling Services, LLC*, United States District
21 Court for the Central District of California Case No. 5:21-CV-001490-JWH-SP;
- 22 ○ *Grant v. T-Mobile USA, Inc.*, United States District Court for the Central District of
23 California Case No. 2:21-CV-02268;
- 24 ○ *Dawson v. Wonderful Pistachios and Almonds, LLC*, Kern County Superior Court
25 Case No. BCV-17-100848;
- 26 ○ *Hamilton, et al. v. Michael Kors Stores (California), Inc.*, Los Angeles County
27 Superior Court Case NO. 19STCV37061;
- 28

- 1 ○ *Ross v. Stater Bros.*, San Bernardino Superior Court Case No. CIVDS1902518;
- 2 ○ *Walker v. Barrett Business Services, Inc., et al.*, Los Angeles County Superior Court
- 3 Case No. 20STCV39172;
- 4 ○ *Benitez, et al. v. Medtronic, Inc., et al.*, Orange County Superior Court Case No. 30-
- 5 2019-01069185-CU-OE-CXC;
- 6 ○ *Montgomery v. Copart, Inc.*, Sacramento County Superior Court Case No. 34-2020-
- 7 00280733-CU-OE-GDS;
- 8 ○ *Vizcarra-McNamee v. Nordstrom, Inc.*, Orange County Superior Court Case No. 30-
- 9 2020-01141916-CU-OE-CXC;
- 10 ○ *Ayers v. Cherry Hill Programs, Inc.*, Fresno County Superior Court Case No.
- 11 20CECG00821;
- 12 ○ *Sleeper v. Boot Barn, Inc.*, Sacramento County Superior Court Case No. 34-2019-
- 13 00272000-CU-OE-GDS;
- 14 ○ *Pulido-Dias v. Dirt Cheap, Inc.*, San Bernardino County Superior Court Case No.
- 15 CIVDS1719694;
- 16 ○ *Villanueva v. Nordstrom, Inc.*, San Bernardino County Superior Court Case No.
- 17 CIVDS1918706;
- 18 ○ *Bryson v. Madame Tussauds, et al.*, Los Angeles County Superior Court Case No.
- 19 19STCV33514
- 20 ○ *Hightower v. Levy Premium, et al.*, Santa Clara County Superior Court Case No.
- 21 19CV359262;
- 22 ○ *Marquez v. Maxim Crane Works, L.P., et al.*, Los Angeles County Superior Court
- 23 Case No. 19STCV39548;
- 24 ○ *Rovira v. Silverado Senior Living Management, Inc.*, Orange County Superior Court
- 25 Case No. 30-2020-01136565-CU-OE-CXC;
- 26 ○ *Hallum, et al. v. FCA US, LLC*, San Bernardino County Case No. CIVDS1936782;
- 27 ○ *Martinez v. Placer Title Co., et al.*, Kern County Case No. BCV-19-103486;
- 28

- *Torres v. Van Law Food Products, Inc.*, Orange County Case No. 37-2017-00946312-CU-OE-CXC;
- *Holmes v. Pet Food Express, LLC*, Alameda County Case No. 22CV014140;
- *Ventura v. Conduent Commercial Solutions, LLC*, Kern County Case No. BCV-22-102043;
- *Ramirez v. CSI Electrical Contractors, Inc.*, Fresno County Superior Court Case No. 18CECG04150;
- *Magana v. Eibach Springs, Inc.*, Riverside County Superior Court Case No. RIC1708917;
- *Knox v. Express Messenger Systems, Inc.*, San Bernardino County Superior Court Case No. CIVDS1932323;
- *Corona, et al. v. G&M Oil Company, Inc.*, Los Angeles County Superior Court Case No. BC640876
- *Aguilar v. Peach Home Services, Inc., et al.*, Riverside County Superior Court Case No. RIC1823057;
- *Wilson v. M.C. LLC*, Orange County Superior Court Case No. 30-2019-01103382-CU-OE-CXC;
- *Nunez v. Nevell Group, Inc.*, Orange County Superior Court Case No. 30-2015-00783269;

31. I am currently litigating at least forty other wage and hour class and PAGA actions in State and Federal courts in the state of California.

32. Based on our experience, we consider ourselves experienced and qualified to evaluate the claims and viability of the defenses. Based on the history of this case and given our firm's extensive experience as class and representative action employment and wage and hour litigators, it is our view that the settlement is fair, reasonable, and adequate, and in the best interest of the Class Members, as well as the State of California (as to the PAGA claims).

1 33. I have no conflicts of interest with the Class or with the Class Representatives. I
2 am not related to either representative Plaintiff. I have not previously represented either
3 Defendant in any matter. In sum, I am well-suited to act as Class Counsel and will continue to
4 vigorously represent the interests of the Class.

5 34. I have been the lead day to day counsel in the litigation of the Class and PAGA
6 actions brought on behalf of Plaintiffs. I have devoted in excess of 150.2 hours in prosecuting the
7 Action. Such hours were reasonable and necessary. I have 17 years of experience and primarily
8 handled the day-to-day litigation of this matter during the action. The following is a summary of
9 my tasks and activities in prosecuting this matter: conferences with clients regarding claims,
10 review client documents, research regarding Defendant entities, draft rule 26 report and attend
11 conference, draft informal discovery statement and attend conference, preparing discovery plans,
12 draft discovery requests, day to day correspondences, conferences with defense counsel,
13 correspondence with client, correspondence with defense counsel, review defense document
14 production, draft and revise CMC statements, draft informal discovery list for mediation,
15 conference regarding mediation preparation, draft mediation brief, participate in mediation,
16 correspondence regarding settlement, multiple drafts and revisions regarding settlement
17 agreement and notice documents, review and revise preliminary approval motion and
18 supplemental documents, review and revise related documents, review and revise final approval
19 motion and fee motion, draft relevant pleadings, draft stipulations. My hourly rate is currently
20 \$825 per hour. The number of hours I expended for work performed and the corresponding
21 attorney's fees in the amount of \$123,915 are reasonable and necessary.

22
23 I declare under penalty of perjury under the laws of the State of California and the United
24 States of America that the foregoing is true and correct.

25 Executed on April 18, 2025 in Encinitas, California.

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28 Christina M. Lucio, Esq.