

JAMES HAWKINS APLC
James R. Hawkins (SBN 192925)
Christina M. Lucio (SBN 253677)
Nicholas Schieffelin (SBN 302329)
9880 Research Drive, Suite 200
Irvine, CA 92618
Tel.: (949) 387-7200
Fax: (949) 387-6676
Email: james@jameshawkinsaplc.com
Email: christina@jameshawkinsaplc.com
Email: nick@jameshawkinsaplc.com

Attorneys for Plaintiff DARWIN COLINAYO,
individually and on behalf of all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF PLACER

DARWIN COLINAYO and EDELMIRA
MALDONADO, on behalf of themselves
and all others similarly situated,

Plaintiff,

v.

MCKESSON MEDICAL-SURGICAL
INC., a Virginia Corporation, and DOES
1-50, inclusive,

Defendants.

Case No. S-CV-0049039

Hon. Trisha Hirashima
Dept.: 42

**PLAINTIFFS' NOTICE OF MOTION AND
MOTION FOR FINAL APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: April 8, 2025
Time: 8:30 a.m.
Dept.: 42

COMPLAINT FILED: SEPTEMBER 2, 2022
FAC FILED: AUGUST 29, 2024
Trial Date: None Set

1 Zorik Mooradian, Esq., CSB No. 136636
2 zorik@mooradianlaw.com
3 Haik Hacopian, Esq., CSB No. 282361
4 haik@mooradianlaw.com
5 MOORADIAN LAW, APC
6 24007 Ventura Blvd., Suite 210
7 Calabasas, CA 91302
8 Telephone: (818) 487-1998
9 Facsimile: (888) 783-1030
10
11 Attorneys for Plaintiff EDELMIRA MALDONADO,
12 individually and on behalf of other persons similarly situated
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1 **TO THE HONORABLE COURT, DEFENDANTS AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 **PLEASE TAKE NOTICE THAT** on April 8, 2025 at 8:30 a.m., or as soon thereafter as
4 the matter may be heard, in Department 42 of the Placer County Superior Court at the Hon.
5 Howard G. Gibson Courthouse located at 10820 Justice Center Drive, Roseville, CA 95678,
6 before the Honorable Trisha Hirashima, Plaintiffs Darwin Colinayo and Edelmira Maldonado
7 (“Plaintiffs”), through their undersigned Class Counsel, will and hereby do move the Court to (1)
8 grant final approval of the Class Action and PAGA Settlement reached between Plaintiffs and
9 Defendant McKesson Medical-Surgical, Inc. (“Defendant”) (collectively “the Parties”), the terms
10 of which are set forth in the Class Action and PAGA Settlement Agreement (“Settlement”)
11 attached as **Exhibit 1** to the supporting Declaration of James R. Hawkins (“Hawkins Final
12 Decl.”); (2) certify the Class for Settlement Purposes; (3) grant the requested settlement
13 administration expenses to the Settlement Administrator, Apex Class Action, LLC, which
14 administered the settlement; and (4) enter final judgement substantially in the form of the
15 proposed order submitted herewith. Plaintiffs concurrently bring a motion for approval of the
16 Class Representatives Service Payments and Attorneys’ Fees and Costs.

17 The Settlement has been successfully administered, and good cause exists for granting the
18 Motion and finding the Settlement and settlement administration expenses to be fair, reasonable,
19 and appropriate.

20 This motion is brought pursuant to California Rule of Court 3.769 and California Code of
21 Civil Procedure section 382, and is based on this Notice of Motion and Motion; the Memorandum
22 of Points and Authorities in support of this Motion; the Declarations of James R. Hawkins and
23 Christina M. Lucio in Support of Final Approval; the Declaration of Zorik Mooradian; the
24 Declaration of Plaintiff Darwin Colinayo in Support of Final Approval; the Declaration of
25 Edelmira Maldonado in Support of Final Approval; the Declaration of Madely Nava of
26 Settlement Administrator Apex Class Action, LLC; the Proposed Order Granting Final Approval
27 of Class Action and PAGA Settlement and Judgement thereon; all documents currently on file in
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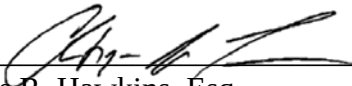
1 this action including without limitation those submitted in support of preliminary approval; the
2 arguments of counsel; and such other and further evidence as the Court may choose to entertain.

3 This motion is set to be heard concurrently with Plaintiffs' Motion for Attorney's Fees
4 and Costs, and Class Representatives Service Payments.

5
6 Respectfully submitted,

7 **JAMES HAWKINS APLC**

8 Dated: March 14, 2025

9 By: 
10 James R. Hawkins, Esq.
11 Christina Lucio, Esq.
12 Nicholas Schieffelin, Esq.

MOORIDIAN LAW, APC

13 Dated: March 14, 2025

14 By: /s/ Haik Hacopian, Esq.
15 Zorik Mooradian, Esq.
16 Haik Hacopian, Esq.

Attorneys for Plaintiffs and the Putative Class