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6 Attorneys for Plaintiffs Christiana Sanchez and Tanya
7 Radogna, on behalf of themselves and all others
similarly situated
8

9 *[Additional Counsel on Next Page]*

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN DIEGO
12

13 CHRISTIANA SANCHEZ and TANYA
14 RADOGNA, individually and on behalf of
themselves and all others similarly situated,
Plaintiffs,
15 v.
16 NATIONSTAR MORTGAGE, LLC, a Delaware
Limited Liability Corporation; and DOES 1-50,
17 inclusive,
Defendant.

Case No. 37-2022-00037558- CU-0 E- CTL
*[Assigned For All Purposes to the Honorable
Judge Joel Wohlfeil]*

NOTICE OF MOTION OF MOTION AND
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT

Date: August 1, 2025
Time: 9:00 a.m.
Dept.: 73

Complaint filed: September 20, 2022
Trial Date: None Set

1 Reuben D. Nathan, Esq. (SBN: 208436)

2 rnathan@nathanlawpractice.com

3 NATHAN & ASSOCIATES, APC

4 2901 W. Coast Hwy., Ste. 200

5 Newport Beach, CA 92663

6 TEL: (949) 270-2798

7 FAX: (949) 209-0303

8 Attorneys for Plaintiffs Christiana Sanchez and Tanya

9 Radogna, on behalf of themselves and all others similarly
10 situated

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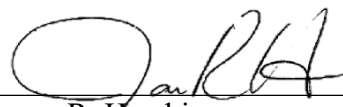
1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT on August 1, 2025, at 9:00 a.m., or as soon thereafter as
3 the matter may be heard, in Department 73 of the above-entitled Court, located at the Hall of
4 Justice at 330 W Broadway, San Diego, California, Plaintiffs Christiana Sanchez and Tanya
5 Radogna will and hereby do move the Court for preliminary approval of a proposed class action
6 settlement in the above-captioned action under Cal. Rule of Court 3.769. The terms of the
7 settlement are contained within the Joint Stipulation of Class Action and PAGA Settlement (the
8 "Settlement Agreement"), filed concurrently herewith as **Exhibit 1** to the Declaration of James R.
9 Hawkins. In addition, Plaintiffs request that the Court conditionally certify the class described in
10 the Settlement Agreement; approve the form of Settlement notice to the Class attached as **Exhibit**
11 **1**, and Settlement Notice to the exempt PAGA Members attached as **Exhibit 2**, to the Settlement
12 Agreement, approve James Hawkins APLC and Nathan & Associates, APC as Class Counsel, and
13 Plaintiffs Christiana Sanchez and Tanya Radogna as the Class Representatives, approve CPT
14 Group, Inc ("CPT") as the Settlement Administrator, and set a final approval hearing.

15 The motion will be based upon this notice of motion and motion, the accompanying
16 memorandum of points and authorities, declarations of James Hawkins, Reuben D. Nathan,
17 Christiana Sanchez, Tanya Radogna, and CPT, the Settlement Agreement and Proposed Notices,
18 the Court's entire file herein, and on such other argument and evidence as the Court may entertain
19 at the hearing on this motion.

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21 Dated: July 8, 2025

JAMES HAWKINS, APLC
NATHAN & ASSOCIATES, APC

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23 _____
24 James R. Hawkins
25 Christina M. Lucio
26 Reuben D. Nathan
27 Attorneys for Plaintiffs Christiana Sanchez and Tanya
28 Radogna, on behalf of themselves and all others
similarly situated