

Brandon Brouillette (SBN 289601)
bbrouillette@crosnerlegal.com
Zachary M. Crosner (SBN 272295)
zach@crosnerlegal.com
CROSNER LEGAL, PC
9440 Santa Monica Blvd, Suite 301
Beverly Hills, California 90210
Tel: (866) 276-7637
Fax: (310) 510-6429

Attorneys for Plaintiffs
[Additional Attorneys Listed on Next Page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN JOAQUIN

SOMALIA GOODWIN, JUAN CARLOS
QUEVEDO, DUSTIN JOHNSON and JOHN
A. MCGEHEE, as individuals on behalf of
themselves and on behalf of all others
similarly situated,

Plaintiffs,

v.

SAVE MART SUPERMARKETS, LLC, a
California Limited Liability Company; and
DOES 1-100, inclusive,
Defendants.

Case No.: (Lead) STK-CV-UOE-2023-2062;
SCV-273343 (MCGEHEE class action) filed
in Sonoma County; SCV-273793
(MCGEHEE PAGA action) filed in Sonoma
County

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

Date: March 25, 26, 27, April 1, 2
Time: 9:00AM
Dept.: 10D

JAMES HAWKINS APLC
James R. Hawkins (#192925)
Gregory Mauro (#222239)
Michael Calvo (#314986)
Lauren Falk (#316893)
Ava Issary (#342252)
9880 Research Drive, Suite 200
Irvine, CA 92618
Tel.: (949) 387-7200
Fax: (949) 387-6676
Email: James@jameshawkinsaplc.com
Email: Greg@jameshawkinsaplc.com
Email: Michael@jameshawkinsaplc.com
Email: Lauren@jameshawkinsaplc.com
Email: Ava@jameshawkinsaplc.com

Attorneys for Plaintiff JOHN A. MCGEHEE

HAINES LAW GROUP, APC
Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Sean M. Blakely (SBN 264384)
sblakely@haineslawgroup.com
Alexandra R. McIntosh (SBN 320904)
amcintosh@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Telephone: (424) 292-2350
Facsimile: (424) 292-2355

Attorneys for Plaintiff JUAN CARLOS QUEVEDO

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP
Norman B. Blumenthal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
Aparajit Bhowmik (State Bar #248066)
Nicholas J. De Blouw (State Bar #280922)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Website: www.bamlawca.com
Blumenthal Nordrehaug Bhowmik De Blouw LLP

Attorneys for DUSTIN JOHNSON

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT on a date to be determined by the Court, at 9:00 a.m.,
3 or as soon thereafter as the matter may be heard, in Department 10D of the above-entitled Court,
4 located at 180 E. Weber St., Stockton, California, Plaintiffs Somalia Goodwin, John A.
5 McGehee, Dustin Johnson, and Juan Carlos Quevedo will move the Court for preliminary
6 approval of a proposed class action settlement in the above-captioned action under Cal. Rule of
7 Court 3.769. The terms of the settlement are contained within the Class Action and PAGA
8 Settlement Agreement (the "Settlement Agreement"), filed concurrently herewith as Exhibit 1 to
9 the Declaration of Brandon Brouillette. In addition, Plaintiffs request that the Court certify the
10 class described in the Settlement Agreement; approve the form of class notice attached as Exhibit
11 A to the Settlement Agreement; approve Crosner Legal, PC, James Hawkins, APLC, Blumenthal
12 Nordehaug Bhowmik De Blouw LLP, and Haines Law Group, APC, as Class Counsel and
13 plaintiffs Somalia Goodwin, John A. McGehee, Dustin Johnson, and Juan Carlos Quevedo as the
14 Class Representatives, approve APEX Class Action Administration ("APEX") as the Settlement
15 Administrator, and set a final approval hearing for ___, 2025, or the first available date on the
16 Court's calendar thereafter.

17
18 The motion will be based upon this notice of motion and motion, the accompanying
19 memorandum of points and authorities, the declarations of counsel Brandon Brouillette, James
20 Hawkins, AJ Bhowmik, Paul Haines, the declarations of Plaintiffs Somalia Goodwin, John A.
21 McGehee, Dustin Johnson, and Juan Carlos Quevado, and the declaration of Sean Hartranft on
22 behalf of Apex, the Settlement Agreement, the Court's entire file herein, and on such other
23 argument and evidence as the Court may entertain at the hearing on this motion.

1 Dated: January 29, 2025

2 **CROSNER LEGAL, PC**

3 By: 

4 BRANDON BROUILLETTE

5 ZACHARY CROSNER

6 SAMANTHA A. SMITH

7 Attorneys for Plaintiff Somalia Goodwin