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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

DRAGUTIN RADIC, an individual, on behalf of
himself and on behalf of all persons similarly
situated,

Plaintiff,

v.

STERIS CORPORATION, an Ohio Corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No. 37-2023-00008579-CU-OE-CTL

CLASS ACTION

Assigned for all Purposes to the Honorable
Marcella O. McLaughlin (Dept. 72)

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR ORDER GRANTING FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Hearing Date: September 25, 2025
Hearing Time: 9:30 a.m.
Hearing Dept: C-72

Complaint Filed: March 1, 2023
FAC Filed: May 9, 2023
Trial Date: Not Set

1 Please take notice that on September 25, 2025 at 9:30 a.m., or as soon thereafter as counsel
2 may be heard, in Department 72 of the San Diego County Superior Court, located at 330 West
3 Broadway, San Diego, California, plaintiff Dragutin Radic (“Plaintiff”) will and hereby does
4 move for an order granting final approval of the class action settlement (the “Settlement”) reached
5 with defendant STERIS Corporation (“Defendant”) that was preliminarily approved by the Court
6 on June 6, 2025.

7 Specifically, Plaintiff moves for an order providing that:

8 1. The Court finds that all the requirements for class certification are satisfied with respect
9 to, and certifies for settlement purposes, a Settlement Class defined as “all field-based non-exempt
10 employees who, at any time between March 1, 2019 and February 28, 2025, worked for Defendant in
11 California.”

12 2. The Court approves the Settlement as fair, adequate and reasonable and finds that:

13 a) the manner for providing class members notice of the Settlement comports with Rule
14 3.766 of the California Rules of Court and the requirements of due process; and

15 b) Plaintiff provided the Labor and Workforce Development Agency (the “LWDA”) notice
16 of the Settlement in accordance with Labor Code Section 2699(l) and the LWDA has not objected to
17 the Settlement.

18 3. The Court finds that no class members objected to the Settlement and only one class
19 member, Jason Nash, requested to be excluded from the Settlement.

20 4. The Court orders that all class members who did not request exclusion from the
21 Settlement are bound by the Release of Class Action Claims as set forth in paragraph E.1 of the
22 Settlement and all PAGA Employees, whether or not they requested exclusion from the Settlement, are
23 bound by the Release of PAGA Claims as set forth in paragraph E.2 of the Settlement.

24 5. The Court orders that, in accordance with the Settlement, Defendant shall transmit to
25 the settlement administrator all funds necessary for making all the payments required under the
26 Settlement.

27 6. The Court orders that payment of settlement administration fees in the amount of
28 \$5,650 shall be made to Phoenix Settlement Administrators in accordance with the Settlement.

1 7. The Court orders that payment of \$75,000 shall be made to the LWDA in accordance
2 with the Settlement.

3 8. The Court orders that payment of \$25,000 shall be made to PAGA Employees (whether
4 or not they requested exclusion from the Settlement) in accordance with the Settlement.

5 9. The Court orders that, in accordance with the Settlement, all settlement benefits payable
6 to class members from the Net Settlement Amount shall be made to class members who did not request
7 exclusion from the Settlement.

8 10. The Court awards Plaintiff the amount of \$60,263.42 for litigation costs, to be paid to
9 Plaintiff's counsel in accordance with the Settlement.

10 11. The Court awards Plaintiff the amount of \$916,666.67 for attorney's fees, to be paid to
11 Plaintiff's counsel in accordance with the Settlement.

12 12. The Court awards Plaintiff the amount of \$10,000 as a class representative enhancement
13 payment, to be paid to Plaintiff in accordance with the Settlement.

14 13. The Court directs that its order granting final approval shall be entered as a final
15 judgment.

16 14. The Court orders that, notwithstanding entry of final judgment, the Court shall retain
17 jurisdiction in this matter for the purposes of interpreting or enforcing the Settlement or final judgment.

18 15. The Court schedules a settlement compliance hearing to be held on or after February 20,
19 2026.

20 Plaintiff's motion is made pursuant to Section 382 of the Code of Civil Procedure and Rule
21 3.769 of the California Rules of Court on the grounds that the Settlement is fair and reasonable; in
22 accordance with due process, class members were provided notice of their rights under the Settlement
23 in a reasonable manner and were given a reasonable opportunity to exclude themselves from the
24 Settlement; and the LWDA was given notice of the Settlement and the date, time and place of the
25 hearing on Plaintiff's motion for final approval of the Settlement.

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1 Plaintiff's motion is based on this Notice; the accompanying Memorandum of Points and
2 Authorities and declarations of Gregory N. Karasik, Alexander I. Dychter, Dragutin Radic, and Kevin
3 Lee; all pleadings and papers on file herein; and upon such oral argument or other matters that may be
4 considered by the Court.

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6 Dated: September 3, 2025

DYCHTER LAW OFFICES, APC
KARASIK LAW FIRM

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8 By: s/ Gregory N. Karasik
9 Alexander I. Dychter
10 S. Adam Spiewak
11 Gregory N. Karasik
Attorneys for Plaintiff and the Settlement Class
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