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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

*Cardinal Health Pharmacy Wage and
Hour Cases,*

Included Action:

DEBORAH JONES and MICHAEL
SALAZAR, individually, and on behalf of
other members of the general public
similarly situated, and as aggrieved
employees pursuant to the Private
Attorneys General Act ("PAGA"),

Plaintiffs,

vs.

CARDINAL HEALTH PHARMACY
SERVICES, LLC, a Delaware limited
liability company; CARDINAL
HEALTH, INC., an Ohio corporation; and
DOES 1 through 10, inclusive,

Defendants.

**JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 5320**

CASE NO.: 23CV419594

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

Hearing Date: July 9, 2025

Hearing Time: 1:30 p.m.

Judge: Hon. Theodore C. Zayner

Dept.: 19

Action Filed: July 25, 2023

Trial Date: Not set

1 **TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on July 9, 2025 at 1:30 p.m., in Department
3 19 of the above entitled Court before the Honorable Theodore C. Zayner, Plaintiffs Deborah
4 Jones and Michael Salazar (“Plaintiffs”) will move for an order: (1) preliminarily approving
5 the proposed settlement of this class action with Defendants Cardinal Health Pharmacy
6 Services, LLC and Cardinal Health, Inc. (“Defendants”); (2) for settlement purposes only,
7 conditionally certifying the Class, which is comprised of “all individuals who are or were
8 directly employed by Defendants in California and classified as a non-exempt employee at
9 any time during the Class Period”, which is October 8, 2020 through May 13, 2025; (3)
10 provisionally appointing Plaintiffs as the representatives of the Class; (4) provisionally
11 appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP and Capstone Law APC as
12 Class Counsel for the Class; (5) approving the form and method for providing notice to the
13 Class of the proposed settlement; (6) directing that notice of the proposed settlement be
14 given to the Class; (7) appointing Apex Class Action as the Administrator; and
15 (8) scheduling a final approval hearing date, proposed for November 12, 2025, to consider
16 the Plaintiffs’ motion for final approval of the settlement and for approval of attorneys’ fees,
17 expenses and the service awards.

18 This motion for preliminary approval of the class settlement is brought pursuant to
19 California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this notice of
20 motion and motion, the accompanying memorandum of points and authorities, the
21 Declaration of Kyle Nordrehaug, the Declaration of Raul Perez, the Declarations of the
22 Plaintiffs, the Class Action and PAGA Settlement Agreement (the “Agreement”) between
23 the parties, and the complete files and records in this action. Because all Parties have agreed
24 to the proposed class settlement, this motion is unopposed.

25 Respectfully submitted,

26 Dated: June 11, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

27 By: /s/ Kyle Nordrehaug
28 Kyle R. Nordrehaug, Esq., Attorney for Plaintiffs