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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LASSEN

NATALIE CHRESTENSEN; DELORIS
RIDDLE, individuals, on behalf of themselves
and on behalf of all persons similarly situated,

Plaintiffs,

v.

NORTHEASTERN RURAL HEALTH
CLINICS, a California Corporation; and DOES
1-50, Inclusive

Defendants.

Case No. 63703

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

Date: November 8, 2022

Time: 9:00 a.m.

Dept.: 2

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on November 8, 2022, at 9:00 a.m., or as soon thereafter as
3 counsel may be heard, in Department 2 of the Lassen Superior Court, plaintiffs NATALIE
4 CHRESTENSEN and DELORIS RIDDLE (hereinafter "Plaintiffs") will, and hereby do, move this
5 Court to:

6 1. Preliminarily approve the settlement described in the Stipulation of Settlement of Class
7 Action and PAGA Claims and Release of Claims ("Agreement") attached as Exhibit 1 to the Declaration
8 of Jean-Claude Lapuyade filed concurrently herewith;

9 2. Conditionally certify the Settlement Class;

10 3. Approve distribution of the proposed Notice of Class Action Settlement to the Settlement
11 Class;

12 4. Appoint Plaintiffs NATALIE CHRESTENSEN and DELORIS RIDDLE as the Class
13 Representatives;

14 5. Appoint the JCL Law Firm, APC, and the Zakay Law Group, APLC as Class Counsel;
15 and

16 7. Set a hearing date for final approval of the settlement.

17 This Motion is based upon: (1) this Notice of Motion and Motion; (2) the Memorandum of Points
18 and Authorities in Support of Motion for Preliminary Approval of Class Action and PAGA Settlement;
19 (3) the Declaration of Jean-Claude Lapuyade, Esq.; (4) the Declaration of Shani O. Zakay, Esq.; (5) the
20 Declaration of Natalie Chrestensen; (6) the Declaration of Deloris Riddle; (7) the Stipulation of
21 Settlement of Class Action and PAGA Claims and Release of Claims and exhibit attached thereto; (8)
22 the [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement and
23 exhibits attached thereto; (9) the records, pleadings, and papers filed in this action; and (10) upon such
24 other documentary and oral evidence or argument as may be presented to the Court at or prior to the
25 hearing of this Motion.

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1 As this Motion is unopposed, the Parties respectfully request relief from the page limit
2 requirement set by California Rules of Court, Rule 3.1113(d).

3
4 Dated: October 6, 2022

JCL LAW FIRM, APC

5 By: 
6 Jean-Claude Lapuyade
7 Attorneys for Plaintiff
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