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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

IRIS ASTUDILLO, an individual,
CRYSTAL DELGADO, an individual, on
behalf of herself and all others similarly
situated,

Plaintiffs,

vs.

TORRANCE HEALTH ASSOCIATION,
INC., a California Corporation; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **20STCV18424**

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

Hearing Date: May 25, 2023
Hearing Time: 9:00 a.m.

Judge: Hon. Elihu M. Berle
Dept.: SS-6

Action Filed: May 11, 2020
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on May 25, 2023, or as soon
thereafter as the matter can be heard, in Department 6 at the above entitled Court before the

1 Honorable Elihu M. Berle, Plaintiffs Iris Astudillo and Crystal Delgado (“Plaintiffs”) will
2 apply for an order: (1) preliminarily approving the proposed settlement of this class action
3 with Defendant Torrance Health Association, Inc. (“Defendant”); (2) for settlement purposes
4 only, conditionally certifying the Class, which consists of both the Wage and Hour Class and
5 the Background Check Class; (3) provisionally appointing Plaintiffs as the representatives of
6 the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug,
7 Aparajit Bhowmik, Nicholas J. De Blouw, Jeffrey S. Herman, and Sergio J. Puche of
8 Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel; (5) approving the form
9 and method for providing class-wide notice; (6) directing that notice of the proposed
10 settlement be given to the class; (7) appointing ILYM Group as Administrator, and
11 (8) scheduling a final approval hearing date to consider Plaintiffs’ motion for final approval
12 of the settlement and entry of the Judgment, and Plaintiffs’ motion for approval of attorneys’
13 fees and expenses.

14 This unopposed motion for preliminary approval of the class settlement is brought
15 pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this
16 notice of motion and motion, the accompanying memorandum of points and authorities, the
17 Declaration of Kyle Nordrehaug, the Class Action, Collective Action and PAGA Settlement
18 Agreement (“Agreement”) between the Parties, and the complete files and records in this
19 action. Because all parties have agreed to the proposed class settlement, this motion is not
20 opposed by Defendant.

21 Respectfully submitted,

22 Dated: April 28, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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