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9 DANELLE EDWARDS

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF FRESNO**

12 DANELLE EDWARDS, as an individual and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 vs.

16 HEALTHCOMP, LLC, a Florida Corporation;
17 and Does 1 through 50, inclusive,

18 Defendants.

Case No: 20CECG02338

CLASS ACTION

**PLAINTIFF'S NOTICE OF MOTION FOR
FINAL APPROVAL OF STIPULATION OF
CLASS ACTION AND PAGA SETTLEMENT**

Date: October 20, 2022
Time: 3:30 p.m.
Dept.: 502
Judge: Hon. Rosemary McGuire

Complaint Filed: August 10, 2020

1 **TO THE HONORABLE COURT, ALL PARTIES AND COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on October 20, 2022 at 3:30 p.m., in Department 502 of the
3 Fresno County Superior Court, at 1130 "O" Street, Fresno, California 93721, before the Honorable
4 Rosemary McGuire, Plaintiff and Class Representative Danelle Edwards ("Plaintiff") will, and hereby
5 does, move the Court for:

- 6 1. Final approval of the Stipulation of Class Action and PAGA Settlement pursuant to
7 California Rules of Court, Rule 3.769, and Labor Code § 2699(1)(2);
- 8 2. Final approval of payment to the LWDA in the amount of \$56,250 (75% of the
9 \$75,000 allocation in satisfaction of Plaintiff's claims under PAGA);
- 10 3. Final approval of payment to the Settlement Administrator in the amount of \$8,995;
- 11 4. A Final Approval Order in accordance with the terms of the Settlement;
- 12 5. Entry of judgment in accordance with the terms of the Settlement; and
- 13 6. Setting of a Final Report hearing to take place not sooner than 120 days following
14 the Court's entry of the Order granting final approval of the Settlement.

15 This Motion is based upon this Notice, the attached Memorandum of Points and Authorities;
16 the Stipulation of Class Action and PAGA Settlement filed on April 27, 2022; the concurrently filed
17 declarations of Jared Hague and Lindsay Kline in support of this Motion, the previously filed Motion
18 for Attorneys' Fees and Costs and declarations in support thereof; and upon such further oral and
19 documentary evidence as may be presented at the time of hearing

20
21 DATE: September 19, 2022



JARED HAGUE
S. BRETT SUTTON
Counsel for Plaintiff
DANELLE EDWARDS