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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF TULARE

JONATHAN SANTIAGO, individually,
and on behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act,

Plaintiff,

vs.

CIGNA HEALTH & LIFE INSURANCE
COMPANY, an unknown business entity;
and DOES 1 through 100, Inclusive,

Defendants.

ADRIAN AVILA, individually, and on
behalf of other aggrieved employees
pursuant to the California Private Attorneys
General Act,

Plaintiff,

vs.

CIGNA HEALTH & LIFE INSURANCE
COMPANY, an unknown business entity;
and DOES 1 through 100, Inclusive,
Defendants.

Case No.: **VCU283599**
Consolidated for All Purposes with
Case No. VCU284920

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

Hearing Date: April 28, 2022

Hearing Time: 8:30 a.m.

*[Hearing set at CMC on March 3, 2022 and by
Order dated April 11, 2022]*

Dept: 1

Judge: Hon. David C. Mathias

Lead Action Filed: July 15, 2020

Trial Date: None set

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2 **TO THE COURT, ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS**
3 **OF RECORD:**
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5 YOU ARE HEREBY NOTIFIED THAT on April 28, 2022 at 8:30 a.m., in
6 Department 1 of the above entitled Court before the Honorable David C. Mathias, Plaintiffs
7 Jonathan Santiago and Adrian Avila (“Plaintiffs”) will apply for an order: (1) preliminarily
8 approving the proposed settlement of this class action with Defendant Cigna Health & Life
9 Insurance Company (“Defendant”); (2) for settlement purposes only, conditionally certifying
10 the Class, which is comprised of “all individuals who are or were employed by Defendant
11 Cigna Health & Life Insurance Company in California who were classified as non-exempt
12 employees during the Class Period” of August 19, 2016 to January 21, 2022; (3)
13 provisionally appointing Plaintiffs as the representatives of the Class; (4) provisionally
14 appointing Edwin Aiwazian, Arby Aiwazian, and Joanna Ghosh of Lawyers *for* Justice, PC.
15 and Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik of Blumenthal
16 Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the Class; (5) approving the
17 form and method for providing class-wide notice; (6) directing that notice of the proposed
18 settlement be given to the class; (7) appointing ILYM Group as Settlement Administrator,
19 and (8) scheduling a final approval hearing date to consider Plaintiffs’ motion for final
20 approval of the settlement and entry of the Judgment, and Plaintiffs’ motion for approval of
21 attorneys' fees and expenses.

22 This unopposed motion for preliminary approval of the class settlement is brought
23 pursuant to California Rules of Court, rule 3.769 and in accordance with the Stipulation and
24 Order dated April 11, 2022. Plaintiffs’ motion will be based on this notice of motion and
25 motion, the accompanying memorandum of points and authorities, the Declaration of Kyle
26 Nordrehaug, the Declaration of Edwin Aiwazian, the Class Action and PAGA Settlement
27 Agreement (“Agreement”) between the parties, and the complete files and records in this
28 action. Because all parties have agreed to the proposed class settlement, this motion is not

1 opposed by Defendant.

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3 Respectfully submitted,

4 Dated: April 15, 2022

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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

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