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Attorneys for Plaintiff and the putative classes

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

LINDA LE, on behalf of herself and all others
similarly situated,

Plaintiffs,

vs.

MILE SQUARE SURGERY CENTER, INC.,
DOUGLAS TRAN, and DOES 2 to 10,
inclusive

Defendants.

CASE NO. 30-2020-01140872-CU-OE-CXC

CLASS ACTION

**NOTICE OF MOTION AND PLAINTIFF’S
MOTION FOR UNOPPOSED PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT AND PROVISIONAL CLASS
CERTIFICATION**

[Assigned for All Purposes to the Hon. Layne H.
Melzer, Dept. CX102]

Date: March 27, 2025
Time: 2:00 p.m.
Dept: CX102
Judge: Layne H. Melzer
Action Filed: May 26, 2020

1 **NOTICE OF MOTION**

2 **TO: ALL PARTIES HEREIN AND TO THEIR COUNSEL OF RECORD:**

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4 PLEASE TAKE NOTICE that on March 27, 2025 at 2:00 p.m. or as soon thereafter as the matter
5 can be heard in Department CX102 in the above entitled courthouse located at 751 W. Santa Ana Blvd.,
6 Santa Ana, CA 92701, Plaintiff Linda Le will move this Court for an order: (1) Provisionally certifying
7 the Class for settlement purposes only; (2) Preliminarily approving the class action settlement embodied
8 in the Stipulation of Settlement and Release; (3) Approving the Notice of Proposed Class Action
9 Settlement and Final Approval Hearing and Class Member Information Sheet (collectively, "Notice
10 Packet") and the plan for distribution of the Notice Packet to Class Members; (4) Appointing Phoenix
11 Settlement Administrators, as the Settlement Administrator; (6) provisionally approving Linda Le as
12 Class Representative; (6) Provisionally approving Thomas A. Rist of Rist Law Office, LC and Brad
13 Nakase of Nakase Law Firm, Inc. as counsel for Plaintiff and Class Members in this matter; and (7)
14 Scheduling a Final Approval Hearing for a date convenient to the Court, but no earlier than 120 days
15 from the date of the Court's order granting Preliminary Approval. Defendants do not oppose this Motion.

16 This Motion is based upon this notice, the accompanying Memorandum of Points & Authorities
17 filed herewith, the accompanying Declaration of Thomas A. Rist, the Stipulation of Settlement and
18 Release and all exhibits, the filings on record in this case, and upon such further evidence, both
19 documentary and oral, that may be presented at the hearing of this motion.

20 DATED: March 11, 2025

RIST LAW OFFICE, LC

NAKASE LAW FIRM, INC.

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23 By:  _____

24 Thomas A. Rist

25 Brad Nakase

26 Attorneys for Plaintiff
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