

JCL LAW FIRM, APC

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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

CECILLE SARMIENTO, an individual, on
behalf of herself and on behalf of all persons
similarly situated,

Plaintiffs,

v.

CADUCEUS HEALTHCARE INC., a
Corporation; and DOES 1 through 50,
Inclusive;

Defendants.

Case No. 37-2021-00002597-CU-OE-CTL

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

Date: March 10, 2023

Time: 10:30 AM

Judge: Richard S. Whitney

Dept.: C-68

1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on March 10, 2023, or as soon
3 thereafter as the matter can be heard, in Department C-68 of the above-entitled Court, before the
4 Honorable Judge Richard S. Whitney, Plaintiff CECILLE SARMIENTO (“Plaintiff”) will apply
5 for an order will apply for an order granting (1) Final Approval of the Class Action and PAGA
6 Settlement, and (2) Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated
8 September 13, 2022, and California Rules of Court, rule 3.769. This Motion will be based on this
9 Notice, the accompanying memorandum of points and authorities, the Stipulation of Class and
10 PAGA Action Settlement and Release of Claims (hereinafter the “Agreement”), the Declaration
11 of Shani O. Zakay, the Declaration of Jean-Claude Lapuyade, the Declaration of Stephanie
12 Molina, (the Settlement Administrator), the Declaration of the Plaintiff, and the complete files and
13 records in this action.

14 Because all parties have agreed to the proposed class settlement and have met and
15 conferred regarding the motion, this motion is not opposed by Defendant. To date, there have
16 been no objections submitted by the Class.

17 Respectfully submitted,

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19 DATED: February 15, 2023

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21 By: 
22 Jean-Claude Lapuyade
23 Attorney for Plaintiff
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