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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF MONTEREY**

RATI GANDHALE, an individual, on
behalf of herself and on behalf of all
persons similarly situated,

Plaintiffs,

v.

SELECT REHABILITATION LLC, a
Limited Liability Company and DOES 1
through 50, Inclusive,

Defendants.

Case No.: **20CV002240**

(Consolidated with Case No. 21CV000740)

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

Hearing Date: June 10, 2022

Hearing Time: 8:30 a.m.

Dept: 14

Judge: Hon. Carrie M. Panetta

Action Filed: August 25, 2020

Trial Date: Not Set

**TO THE COURT, ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS
OF RECORD:**

1 YOU ARE HEREBY NOTIFIED THAT on June 10, 2022 at 8:30 a.m., in
2 Department 14 of the above entitled Court before the Honorable Carrie M Panetta, Plaintiff
3 Rati Gandhale (“Plaintiff”) will apply for an order: (1) preliminarily approving the proposed
4 settlement of this class action with Defendant Select Rehabilitation, LLC (“Defendant”);
5 (2) for settlement purposes only, conditionally certifying the Class, which is comprised of
6 “all individuals who are or previously were employed by Defendant in California in one or
7 more of the Covered Positions during Class Period [August 25, 2016 through December 28,
8 2021]”; (3) provisionally appointing Plaintiff as the representative of the Class; (4)
9 provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik
10 of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the Class; (5)
11 approving the form and method for providing class-wide notice; (6) directing that notice of
12 the proposed settlement be given to the class; (7) appointing Simpluris as Settlement
13 Administrator; and, (8) scheduling a final approval hearing date to consider Plaintiff’s
14 motion for final approval of the settlement and entry of the Judgment, and Plaintiff’s motion
15 for approval of attorneys' fees and expenses.

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

22 Respectfully submitted,

23 Dated: May 10, 2022

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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