

JAMES HAWKINS APLC

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Attorneys for Plaintiff TANIYA ABRON,
on behalf of herself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

TANIYA ABRON, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

UNIVERSITY HEALTHCARE ALLIANCE,
a California Corporation; and DOES 1-10,
inclusive,

Defendants.

Case No. RG20066438

Assigned for all purposes to
Hon. Evelio Grillo
Dept. 21

Reservation ID: 949352402507

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION FOR FINAL APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS, AND
CLASS REPRESENTATIVE SERVICE
PAYMENT**

Date: December 29, 2023
Time: 9:00 a.m.
Dept: 21

Action Filed: June 30, 2020
SAC Filed: Sept. 28, 2022
Trial Date: None Set

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

2 **PLEASE TAKE NOTICE** that on December 29, 2023 at 9:00 a.m. in Department 21 of
3 the Alameda Superior Court located at 1221 Oak Street, Oakland, CA 94612, or as soon
4 thereafter as this matter can be heard, Plaintiff Taniya Abron (“Plaintiff”) will and hereby does
5 move this Court for an order granting final approval of the Class Action and PAGA Settlement
6 Agreement (“Settlement”) by and between Plaintiff, on behalf of herself and the conditionally
7 certified Class, and Defendant University Healthcare Alliance (“UHA” or “Defendant”). Plaintiff
8 respectfully requests that the Court (1) finally approve the settlement as fair, adequate, and
9 reasonable; (2) certify the Settlement Class for settlement purposes; (3) grant the requested
10 settlement administration expenses to the Settlement Administrator, CPT Group, Inc., which has
11 managed the settlement administration; and (4) enter final judgment substantially in the form of
12 the proposed order submitted herewith.

13 The Settlement has been successfully administered, and good cause exists for granting
14 the Motion and finding the Settlement and settlement administration expenses to be fair,
15 reasonable, and appropriate.

16 **PLEASE TAKE FURTHER NOTICE** that Plaintiff will also and hereby does move
17 this Court for an order awarding (a) Class Counsel’s Fees Payment in the amount of one-third of
18 the Gross Settlement Amount (\$1,666,666.00) and Class Counsel Litigation Expenses payment
19 of \$15,724.47; and (b) a Class Representative Service Payment in the amount of \$10,000.00 to
20 Plaintiff as Class Representative.

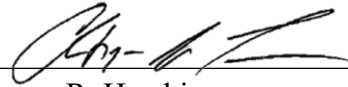
21 This motion is brought pursuant to California Rule of Court 3.769 and California Code of
22 Civil Procedure section 382, and is based on this Notice of Motion and Motion; the
23 Memorandum of Points and Authorities in support of the Motion; the Declaration of James R.
24 Hawkins; the Declaration of Plaintiff Taniya Abron; the Declaration of Jennifer Forst on behalf
25 of CPT Group, Inc.; the Proposed Order Granting Final Approval of Class Action and PAGA
26 Settlement Agreement and Judgement; all documents currently on file in this action including
27 without limitation those submitted in support of preliminary approval; the arguments of counsel;
28

1 and such other and further evidence as the Court may choose to entertain.

2
3 **Dated:** December 6, 2023

JAMES HAWKINS, APLC

4
5 By:



6 James R. Hawkins
Christina M. Lucio

7
8 Attorneys for Plaintiff and the
Conditionally Certified Class



Superior Court of Alameda County Public Portal

Court Reservation Receipt

Reservation

Reservation ID:
949352402507

Status:
RESERVED

Reservation Type:
Motion (Motion for Final Approval of Class Action and
PAGA Action Settlement)

Number of Motions:
1

Case Number:
RG20066438

Case Title:
Abron VS University Healthcare Alliance, a California
corpor

Filing Party:
Taniya Abron (Plaintiff)

Location:
Rene C. Davidson Courthouse - Department 21

Date/Time:
December 29th 2023, 9:00AM

Confirmation Code:
CR-GXCGOU6NZMXEPSPZG

Fees

Description	Fee	Qty	Amount
Motion (name extension)	.00	1	.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount:
\$1.00

Type:
Visa

Account Number:
XXXX6358

Authorization:
06251D

Payment Date:
2023-09-06

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