

1 **BLUMENTHAL NORDREHAUG BHOWMIK**
2 **DE BLOUW LLP**

3 Norman B. Blumenthal (State Bar #068687)

4 Kyle R. Nordrehaug (State Bar #205975)

5 Aparajit Bhowmik (State Bar #248066)

6 2255 Calle Clara

7 La Jolla, CA 92037

8 Telephone: (858)551-1223

9 Facsimile: (858) 551-1232

10 Website: www.bamlawca.com

11 Attorneys for Plaintiffs

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **IN AND FOR THE COUNTY OF SAN DIEGO**

14 XAVIER DREMEE, CHRISTINA
15 BONNIWELL, and ALEXIS MONROE,
16 individually, on behalf of themselves and
17 on behalf of all persons similarly situated,

18 Plaintiff,

19 vs.

20 AURORA-SAN DIEGO, LLC, a
21 California Limited Liability Company;
22 SIGNATURE HEALTHCARE
23 SERVICES, LLC, a Limited Liability
24 Company; and DOES 1 through 50,
25 inclusive,

26 Defendants.

Case No. 37-2021-00007280-CU-OE-CTL

**NOTICE OF MOTION AND MOTION
FOR FINAL APPROVAL OF CLASS
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS AND
SERVICE AWARDS**

Hearing Date: February 16, 2024

Hearing Time: 9:30 a.m.

*[Hearing scheduled by Order dated
September 21, 2023]*

Judge: Hon. Gregory W. Pollack

Dept: 71

Action Filed: February 19, 2021

Trial Date: Vacated

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on February 16, 2024 or as soon
3 thereafter as the matter can be heard, in Department 71 of the above entitled Court before the
4 Honorable Gregory W. Pollack, Plaintiffs Christina Bonniwell, Alexis Monroe, and Xavier
5 Dremee (“Plaintiffs”) will move for an order granting (1) Final Approval of the Class Action
6 Settlement and Award of Attorneys’ Fees Costs and Service Awards, and (2) Entry of the Final
7 Approval Order and the Judgment.

8 This motion is brought in accordance with the Order dated September 21, 2023, and
9 California Rules of Court, rule 3.769. This Motion will be based on this notice, the
10 accompanying points and authorities, the Declaration of Norman Blumenthal, the Class Action
11 and PAGA Settlement Agreement and Stipulation to Modify Agreement (collectively the
12 “Agreement”), the Declaration of Christina Fowler (the Administrator), the Declarations of the
13 Plaintiffs, and the complete files and records in this action.

14 Because Plaintiffs and Defendant Aurora San Diego, LLC (“Defendant”) have agreed
15 to the proposed class settlement and have met and conferred regarding the motion, this motion
16 is not opposed. There have been no objections submitted by the Class.

17 Respectfully submitted,

18 Dated: January 22, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

20 By: /s/ Kyle Nordrehaug
21 Norman B. Blumenthal, Esq.
22 Kyle R. Nordrehaug, Esq.

23 Attorneys for Plaintiffs
24
25
26
27
28