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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

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

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

20 Plaintiff,

21 vs.

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

28 Defendants.

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

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

Hearing Date: September 21, 2023  
Hearing Time: 9:30 a.m.

Judge: Hon. Gregory W. Pollack  
Dept: 71

Action Filed: February 19, 2021  
Trial Date: Vacated

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

YOU ARE HEREBY NOTIFIED THAT on September 21, 2023 at 9:30 a.m., in  
Department 71 of the above entitled Court before the Honorable Gregory W. Pollack,

1 Plaintiffs Christina Bonniwell, Alexis Monroe, and Xavier Dremee (“Plaintiffs”) will apply  
2 for an order: (1) preliminarily approving the proposed settlement of this class action with  
3 Defendant Aurora San Diego, LLC (“Defendant”); (2) for settlement purposes only,  
4 conditionally certifying the Class, which is comprised of “all individuals who are or  
5 previously were employed by Defendant in California who were classified as non-exempt  
6 employees during the Class Period” of July 30, 2019 to August 16, 2022; (3) provisionally  
7 appointing Plaintiffs as the representatives of the Class; (4) provisionally appointing  
8 Norman B. Blumenthal, Kyle R. Nordrehaug and Aparajit Bhowmik of Blumenthal  
9 Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the Class; (5) approving the  
10 form and method for providing class-wide notice; (6) directing that notice of the proposed  
11 settlement be given to the Class; (7) appointing ILYM Group as the Administrator; and  
12 (8) scheduling a final approval hearing date proposed for February 16, 2024 to consider  
13 Plaintiffs’ motion for final approval of the settlement and entry of the Judgment, and  
14 Plaintiffs’ motion for approval of attorneys' fees and expenses.

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

23 Respectfully submitted,

24 Dated: August 28, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK  
DE BLOUW LLP**

25 By: /s/ Kyle Nordrehaug  
26 Kyle R. Nordrehaug, Esq.  
27 Attorney for Plaintiffs  
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