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Attorneys for Plaintiffs

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

JACQUELINE MARSHALL, LANCE
PHILLIPS, KRISTIN KNOWLES, CHRIS
ANDERSON, KAYVAN MARSHALL,
KANE EDWARDS, JORDAN MOSER,
KYLE EVANS, JENNA DIAZ, TERRI
MAURICIO, JOANN LEE, TEISLEYE
SMITH, LAUREN YOUNG, HEATHER
IMHOF, STEPHANIE SWISHER, JOHN
SICKMAN and MARK HARMON,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiffs,

v.

PHI AIR MEDICAL, LLC, a Limited
Liability Company; PHI HEALTH, LLC, a
Limited Liability Company; and Does 1
through 50, Inclusive,

Defendants.

Case No.: **63485**

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

Hearing Date: July 26, 2022
Hearing Time: 9:00 a.m.

Dept: 2
Judge: Hon. Mark R. Nareau

Action Filed: March 17, 2021
Trial Date: Not Set

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

YOU ARE HEREBY NOTIFIED THAT on July 26, 2022 at 9:00 a.m., in

1 Department 2 of the above entitled Court before the Honorable Mark R. Nareau, Plaintiffs
2 Jacqueline Marshall, Lance Phillips, Kristin Knowles, Christopher Anderson, Kayvan
3 Marshall, Kane Edwards, Jordan Moser, Kyle Evans, Jenna Diaz, Terrianne Mauricio, Joann
4 Lee, Teisleye Smith, Lauren Young, Heather Imhof, Stephanie Swisher, John Sickman, and
5 Mark Harmon ("Plaintiffs") will apply for an order: (1) preliminarily approving the proposed
6 settlement of this class action with Defendant PHI Health, LLC ("Defendant"); (2) for
7 settlement purposes only, conditionally certifying the Class, which is comprised of "all
8 individuals who are or previously were employed by Defendant in California who were
9 classified as non-exempt employees at any time during the Class Period" of August 2, 2019
10 through October 27, 2021;" (3) provisionally appointing Plaintiffs as the representatives of
11 the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug,
12 Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel
13 for the Class; (5) approving the form and method for providing class-wide notice; (6)
14 directing that notice of the proposed settlement be given to the class; (7) appointing
15 Simpluris as Settlement Administrator, and (8) scheduling a final approval hearing date to
16 consider Plaintiffs' motion for final approval of the settlement and entry of the Judgment,
17 and Plaintiffs' motion for approval of attorneys' fees and expenses.

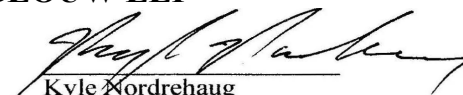
18 This unopposed motion for preliminary approval of the class settlement is brought
19 pursuant to California Rules of Court, rule 3.769. Plaintiffs' motion will be based on this
20 notice of motion and motion, the accompanying memorandum of points and authorities, the
21 Declaration of Kyle Nordrehaug,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

24 Respectfully submitted,

25 Dated: June 27, 2022

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

26 By:


27 Kyle Nordrehaug
28 Attorney for Plaintiff