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

HILARY CEARLY and YEKATERINA
KUCHEROVA, et al.,

Plaintiffs,

vs.

UNIVERSITY RETIREMENT
COMMUNITY AT DAVIS, INC., a
Corporation; PACIFIC RETIREMENT
SERVICES, INC., a Corporation; and DOES
1 through 50, inclusive,

Defendants.

**Case No. CV2021-0524
[Consolidated with Case No. CV2021-0531]**

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

Hearing Date: February 15, 2023
Hearing Time: 9:00 a.m.

*[Hearing scheduled by Order dated September
28, 2022 at paragraph 12]*

Judge: Hon. Samuel T. McAdam
Dept: 10

Action Filed: March 26, 2021
Trial Date: Not Set

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on February 15, 2023 or as soon thereafter
3 as the matter can be heard, in Department 10 of the above entitled Court before the Honorable Samuel
4 T. McAdam, Plaintiffs Hilary Cearley and Yekaterina Kucherova ("Plaintiffs") will move for an order
5 granting (1) Final Approval of the Class Action Settlement, and (2) Entry of the Final Approval Order
6 and Judgment.

7 This motion is brought in accordance with the Order dated September 28, 2022, and California
8 Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and
9 authorities, the Declaration of Norman Blumenthal, the Declaration of Madely Nava (the Settlement
10 Administrator), the declarations of Plaintiffs Hilary Cearley and Yekaterina Kucherova, the Class
11 Action Settlement Agreement (the "Agreement"), and the complete files and records in this action.

12 Because Plaintiffs and Defendants University Retirement Community at Davis, Inc., and Pacific
13 Retirement Services, Inc. ("Defendants") have agreed to the proposed class settlement and have met
14 and conferred regarding the motion, this motion is not opposed. There have been no objections
15 submitted by the Class.

16
17 Respectfully submitted,

18 Dated: January 23, 2023

19 **BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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21 By: /s/ Kyle Nordrehaug
22 Norman B. Blumenthal
23 Kyle R. Nordrehaug
24 Attorney for Plaintiffs
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