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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

NICOLE GRIMES, individually, and on behalf
of other members of the general public similarly
situated;

Plaintiff,

v.

PACIFIC CARDIOVASCULAR
ASSOCIATES MEDICAL GROUP, INC., a
California corporation; and DOES 1 through
100, inclusive;

Defendants.

Case No.: 30-2020-01168857-CU-OE-CXC

Assigned for All Purposes to:
Honorable Lon F. Hurwitz
Department CX-103

CLASS ACTION

**SECOND SUPPLEMENTAL BRIEF IN
SUPPORT OF PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

RELATED TO ROA NO. 205

[Second Supplemental Declaration of
Proposed Class Counsel (Douglas Han) filed
concurrently herewith]

Hearing Date: September 20, 2024
Hearing Time: 1:30 p.m.
Hearing Place: Department CX-103

Complaint Filed: November 5, 2020
FAC Filed: November 20, 2023
Trial Date: None Set

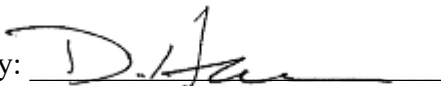
Plaintiff Nicole Grimes (“Plaintiff”) provide this supplemental submission in response to the Court’s tentative ruling on the Motion for Preliminary Approval of Class Action Settlement. On July 26, 2024, prior to the originally scheduled Preliminary Approval Hearing, the Court issued a tentative ruling ordering Plaintiff and Defendants Pacific Cardiovascular Associates Medical Group, Inc. and Via Vitae MSO, LLC (“Defendants”) to file additional information and continuing the Preliminary Approval Hearing to September 20, 2024 at 1:30 p.m.

The chart below lists each of the Court’s issues from the tentative ruling and the revisions/submissions made to address each issue.

Ruling	Revisions/Submissions
(1) Plaintiff’s General Release still generally includes claims “in tort, contract, and equity” arising out of Plaintiff’s employment, even if those claims are unrelated to the SAC or LWDA Notice Letter.	The Settlement Agreement has been amended accordingly. (Second Supplemental Declaration of Douglas Han in Support of Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶ 5; Exhibits 2, <i>supra</i> , at § III(M).)
(2) In Paragraph 1 of the Amended Proposed Order, the Settlement Agreement is not identified by the ROA number of the declaration to which it is attached.	The Proposed Order has been revised accordingly. (Supp Han Decl., <i>supra</i> , at ¶ 6; Exhibit 4, <i>supra</i> , at ¶ 1.)

Dated: August 12, 2024

JUSTICE LAW CORPORATION

By: 
Douglas Han
Attorney for Plaintiff

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On August 12, 2024 I served the foregoing document described as

**SECOND SUPPLEMENTAL BRIEF IN SUPPORT OF
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

for the following case: **Grimes v. Pacific Cardiovascular Associates Medical Group, Inc.**
 LWDA/Court Case No.: **LWDA Case No.: CM- 801113-20**
Court Case No.: 30-2020-01168857-CU-OE-CXC
Orange County Superior Court

on interested parties in this action by electronically submitting as follows:

State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, California 95814

[X] BY ELECTRONIC SUBMISSION

Pursuant to California Senate Bill No. 836, I caused the documents described above to be electronically submitted by and through the procedure stated on the website of the State of California Labor and Workforce Development Agency.

[X] STATE

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 12, 2024, at Pasadena, California.


Christina Castro