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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

ERYN WHITE, on behalf of himself and
on behalf of all persons similarly situated,

Plaintiff,

vs.

ADVANCED HOME HEALTH, INC.,
California Corporation; ADVANCED
HOMES HEALTH HOSPICE, INC. a
California Corporation; ADVANCED
HOME HEALTH NORTHBAY, INC. a
California Corporation; ADVANCED
HOME HEALTH SAN DIEGO, INC., a
California Corporation; and DOES 1
through 50, inclusive,

Defendants.

Lead Case No.: **34-2021-00295374**

**PLAINTIFF'S NOTICE OF MOTION
AND UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Hearing Date: February 24, 2022

Hearing Time: 9:00 a.m.

Reservation No. 2615483

Dept.: 54

Judge: Hon. Christopher E. Krueger

Lead Action Filed: February 26, 2021

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on February 24, 2022 at 9:00 a.m., in
Department 54 at the Hall of Justice Courthouse of the above entitled Court before the
Honorable Christopher E. Krueger, Plaintiff Eryn White ("Plaintiff") will apply for an order:

1 (1) preliminarily approving the proposed settlement of this class action with Defendants
2 Advanced Home Health, Inc., Advanced Home Health and Hospice, Inc., Advanced Home
3 Health Northbay, Inc., Advanced Home Health San Diego, Inc. (collectively "Defendants");
4 (2) for settlement purposes only, conditionally certifying the Class, which is comprised of
5 "all individuals who are or previously were employed by Defendants in California and who
6 were classified as non-exempt employees at any time during the Class Period"; (3)
7 provisionally appointing Plaintiff as the representative of the Class; (4) provisionally
8 appointing Norman B. Blumenthal, Kyle R. Nordrehaug, and Aparajit Bhowmik of
9 Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the Class; (5)
10 approving the form and method for providing class-wide notice; (6) directing that notice of
11 the proposed settlement be given to the class; (7) appointing Phoenix Settlement
12 Administrators as Settlement Administrator, and (8) scheduling a final approval hearing date
13 to consider Plaintiff's motion for final approval of the settlement and entry of the Judgment,
14 and Plaintiff's motion for approval of attorneys' fees and expenses.

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

21 Respectfully submitted,

22 Dated: January 12, 2022

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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24 By: 
25 Norman B. Blumenthal, Esq.
26 Kyle R. Nordrehaug, Esq.
27 Attorney for Plaintiff
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