

Carolyn H. Cottrell (SBN 166977)
Ori Edelstein (SBN 268145)
Andrew Weaver (SBN 318935)
SCHNEIDER WALLACE
COTTRELL KONECKY LLP
2000 Powell Street, Suite 1400
Emeryville, California 94608
Telephone: (415) 421-7100
Facsimile: (415) 421-7105
ccottrell@schneiderwallace.com
oedelstein@schneiderwallace.com
aweaver@schneiderwallace.com

Michael D. Singer (SBN 115301)
Diana M. Khoury (SBN 128643)
Kristina De La Rosa (SBN 279821)
Rosemary C. Khoury (SBN 331307)
COHELAN KHOURY & SINGER
605 C Street, Suite 200
San Diego, CA 92101
Telephone: (619) 595-3001
Facsimile: (619) 595-3000
msinger@ckslaw.com
dkhoury@ckslaw.com
kdelarosa@ckslaw.com
rkhoury@ckslaw.com

Additional Counsel on Following Page
Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

DONOVIN FOXX, BYRON BRYANT, and
YOLANDA CARBAJAL, on behalf of
themselves, the State of California and all
aggrieved employees

Plaintiffs,

v.

HEALTHCARE SERVICES GROUP, INC.,
a Pennsylvania Corporation; HCSG WEST
LLC, a New Jersey Limited Liability
Company; KOA HOLDINGS, LLC, a
California Limited Liability Company d/b/a
COTTONWOOD CANYON
HEALTHCARE CENTER; and DOES 1-10,
inclusive,

Defendants.

Case No.: RG21100855

ASSIGNED FOR ALL PURPOSES TO
THE HON. EUMI LEE

**NOTICE OF MOTION AND MOTION TO
APPROVE SETTLEMENT PURSUANT TO
PRIVATE ATTORNEYS GENERAL ACT
OF 2004**

Date: January 21, 2022

Time: 8:30 a.m.

Department: 512

Res. ID: 505433587009

Jonathan M. Lebe (SBN 284605)
LEBE LAW, APC
777 South Alameda Street
Los Angeles, CA 90021
Telephone: (213) 358-7046
jon@lebelaw.com

*Attorneys for Plaintiffs Donovan Foxx, Byron Bryant,
and Yolanda Carbajal on behalf of themselves, the
State of California, and all Aggrieved Employees*

1 **TO THE HONORABLE COURT, ALL INTERESTED PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that on January 21, 2022, at 8:30 a.m., or as soon thereafter as
4 the matter may be heard, in Department 512 of the Superior Court of California, County of
5 Alameda, located at the Hayward Hall of Justice, 24405 Amador Street, Hayward, California
6 94544, Plaintiffs Donovan Foxx, Byron Bryant, and Yolanda Carbajal (collectively “Plaintiffs”)
7 will and hereby do move this Court for an Order approving a settlement pursuant to the Private
8 Attorneys General Act of 2004, California Labor Code §§ 2698, *et seq.* (the “PAGA”). The
9 proposed settlement resolves all claims in the matter.

10 This Motion is based upon this Notice of Motion and Motion; the Memorandum of Points
11 and Authorities, the Declarations of Carolyn Hunt Cottrell, Michael D. Singer, and Jonathan M.
12 Lebe; the Settlement Agreement and Release of Claims—Private Attorneys General Act; the
13 Proposed Order Approving PAGA Settlement and Judgment; all other records, pleadings, and
14 papers filed in this action; and upon such other evidence or argument as may be presented to the
15 Court at the hearing on this Motion.

16
17 Dated: December 28, 2021

Respectfully Submitted,

18
19 

20 Carolyn H. Cottrell
21 Ori Edelstein
22 Andrew Weaver
SCHNEIDER WALLACE
COTTRELL KONECKY LLP

23 *Attorneys for Plaintiff Mary Jane Gonzales on behalf of*
24 *the State of California, and all Aggrieved Employees*
25
26
27
28



Superior Court of Alameda County Public Portal

Make a Reservation

Foxx VS Healthcare Services Group, Inc.

Case Number: RG21100855 Case Type: Unlimited Civil Category: Other Employment Complaint Case

Date Filed: 2021-06-03 Location: Hayward Hall of Justice - Department 512

Reservation

Case Name: Foxx VS Healthcare Services Group, Inc.	Case Number: RG21100855
Type: Motion to Confirm Settlement	Status: RESERVED
Filing Party: Yolanda Carbajal (Plaintiff)	Location: Hayward Hall of Justice - Department 512
Date/Time: 01/21/2022 8:30 AM	Number of Motions: 1
Reservation ID: 505433587009	Confirmation Code: CR-MTSD2UMFFXD4JBCB6

Fees

Description	Fee	Qty	Amount
Motion to Confirm Settlement	0.00	1	0.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount: \$1.00	Type: MasterCard
Account Number: XXXX3681	Authorization: 05764S

[Print Receipt](#)

[Reserve Another Hearing](#)

[View My Reservations](#)

[Terms of Service](#)

[Contact Us](#)

[About this Site](#)

Copyright © Journal Technologies, USA. All rights reserved.