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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

CHRIS FARLEY, IRENE IMSON,
SHELBY WARD, and DARLENE
GRIFFITH, individuals, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiff,

vs.

SHARP MEMORIAL HOSPITAL, a
California Corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No. 37-2021-00006007-CU-OE-CTL

[Consolidated with Case No.
37-2021- 00047190-CU-OE-CTL]

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

Hearing Date: December 1, 2023
Hearing Time: 8:30 a.m.

Judge: Hon. Robert Longstreth
Dept.: 65

Action Filed: February 9, 2021
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on December 1, 2023 at 8:30 a.m., in

1 Department 65 of the above entitled Court before the Honorable Robert Longstreth,
2 Plaintiffs the Estate of Chris Farley, Shelby Ward, Darlene Griffith, and Irene Imson
3 (“Plaintiffs”) will apply for an order: (1) preliminarily approving the proposed settlement of
4 this class action with Defendant Sharp Memorial Hospital (“Defendant”); (2) for settlement
5 purposes only, conditionally certifying the Class, which is comprised of “all individuals who
6 are or previously were employed by Defendant who were classified as non-exempt
7 employees, excluding bargaining unit nurses, at any time during the Class Period” of
8 February 9, 2017 through April 23, 2023; (3) provisionally appointing Plaintiffs as the
9 representatives of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R.
10 Nordrehaug, and Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP
11 and Matthew J. Matern and Launa Adolph of Matern Law Group, PC as Class Counsel for
12 the Class; (5) approving the form and method for providing class-wide notice; (6) directing
13 that notice of the proposed settlement be given to the Class; (7) appointing ILYM Group as
14 the Administrator; and (8) scheduling a final approval hearing date (proposed for April 26,
15 2024) to consider Plaintiffs’ motion for final approval of the settlement and for approval of
16 attorneys’ fees and expenses.

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

24 Respectfully submitted,

25 Dated: November 6, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

26
27 By: /s/ Kyle Nordrehaug
28 Kyle R. Nordrehaug, Esq.
Attorney for Plaintiffs