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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

JUNO CHUA, on behalf of himself and
on behalf of all persons similarly
situated,

Plaintiff,

vs.

BEECAN HEALTH LLC, a California
Limited Liability Company; SERRANO
POST ACUTE, LLC, a California
Limited Liability Company; CORONA
POST ACUTE, LLC, a California
Limited Liability Company;
CALIFORNIA POST ACUTE LLC, a
California Limited Liability Company;
LA FUENTE CARE POST ACUTE
LLC, a California Limited Liability
Company; MONROVIA POST ACUTE,
LLC, a California Limited Liability
Company; ROYAL GARDENS
HEALTHCARE, LLC, a California
Limited Liability Company; and DOES
1 through 50, inclusive,

Defendants.

Case No. 21STCV24458

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

Hearing Date: August 1, 2021
Hearing Time: 10:00 a.m.

Judge: Hon. Lawrence P. Riff
Dept: SS-7

Date Filed: July 1, 2021
Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT on August 1, 2023 at 10:00 a.m., in
3 Department 7 of the above entitled Court before the Honorable Lawrence P. Riff, Plaintiff
4 Juno Chua (“Plaintiff”) will move for an order: (1) preliminarily approving the proposed
5 settlement of this class action with Defendants Beecan Health LLC, California Post Acute
6 LLC, Serrano Post Acute, LLC, Corona Post Acute, LLC, La Fuente Care Post Acute LLC,
7 Monrovia Post Acute LLC, and Royal Gardens Healthcare, LLC (“Defendants”); (2) for
8 settlement purposes only, conditionally certifying the Class, which is comprised of “all
9 individuals who are or previously were employed by one or more Defendants in California
10 who were classified as non-exempt employees during the Class Period”; (3) provisionally
11 appointing Plaintiff as the representative of the Class; (4) provisionally appointing Norman
12 B. Blumenthal, Kyle R. Nordrehaug, and Aparajit Bhowmik of Blumenthal Nordrehaug
13 Bhowmik De Blouw LLP as Class Counsel for the Class; (5) approving the form and method
14 for providing notice to the Class of the proposed settlement; (6) directing that notice of the
15 proposed settlement be given to the Class; (7) appointing ILYM Group, Inc. as the
16 Administrator; and (8) scheduling a final approval hearing date proposed for a date in
17 approximately four months to consider the Parties’ motion for final approval of the
18 settlement and entry of the Judgment, and Plaintiff’s motion for approval of attorneys’ fees
19 and expenses.

20 This motion for preliminary approval of the class settlement is brought pursuant to
21 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of
22 motion and motion, the accompanying memorandum of points and authorities, the
23 Declaration of Kyle Nordrehaug, the Class Action and PAGA Settlement Agreement (the
24 “Agreement”) between the parties, and the complete files and records in this action.
25 Because all Parties have agreed to the proposed class settlement, this joint motion is
26 unopposed.

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Respectfully submitted,

Dated: June 16, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

By: /s/ Kyle Nordrehaug
Kyle R. Nordrehaug, Esq.
Attorney for Plaintiff