

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

2255 Calle Clara

La Jolla, CA 92037

Telephone: (858)551-1223

Facsimile: (858) 551-1232

Website: www.bamlawca.com

Attorneys for Plaintiff

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 FINAL APPROVAL OF CLASS
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS AND
SERVICE AWARD**

Hearing Date: March 5, 2024

Hearing Time: 10:00 a.m.

*[Hearing scheduled by Order dated October
19, 2023]*

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 at 10:00 a.m. on March 5, 2024 or as soon
3 thereafter as the matter can be heard, in Department SS-7 of the above entitled Court before the
4 Honorable Lawrence P. Riff, Plaintiff Juno Chua ("Plaintiff") will move for an order granting
5 (1) Final Approval of the Class Action Settlement and the Award of Attorneys' Fees Costs and
6 Service Award, and (2) Entry of the Final Approval Order and the Judgment.

7 This motion is brought in accordance with the Order dated October 19, 2023, and
8 California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Declaration of Norman Blumenthal, the Class Action
10 and PAGA Settlement Agreement (the "Agreement"), the Declaration of Nicole Bench (the
11 Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

12 Because Plaintiff and Defendants Beecan Health LLC, California Post Acute LLC,
13 Serrano Post Acute, LLC, Corona Post Acute, LLC, La Fuente Care Post Acute LLC, Monrovia
14 Post Acute LLC, and Royal Gardens Healthcare, LLC ("Defendants") have agreed to the
15 proposed class settlement and have met and conferred regarding the motion, this motion is not
16 opposed. There have been no objections submitted by the Class.

17 Respectfully submitted,

18 Dated: February 6, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

20 By: /s/ Kyle Nordrehaug
21 Norman B. Blumenthal, Esq.
22 Kyle R. Nordrehaug, Esq.

23 Attorneys for Plaintiff
24
25
26
27
28