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7 Attorneys for Plaintiffs BLANCA
VILLAGOMEZ,
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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE**
12

13 BLANCA VILLAGOMEZ, as an individual
and on behalf of all others similarly situated,

14 Plaintiff,
15 v.

16 SIMI VALLEY HOSPITAL AND
HEALTHCARE SERVICES, d.b.a.
17 ADVENTIST HEALTH SIMI VALLEY, a
California corporation; ADVENTIST
18 HEALTH SYSTEM/WEST, a California
corporation; and DOES 1-100, inclusive,

19 Defendants.
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Case No.: 21STCV38017 (Lead Case)
21STCV43678 (Related Case)

Assigned for All Purposes to:
Hon. Elihu M. Berle
Dept.: 6

**NOTICE OF MOTION AND MOTION FOR
APPROVAL OF SETTLEMENT UNDER
PRIVATE ATTORNEYS GENERAL ACT**

Date: March 14, 2025
Time: 10:00 am
Dept.: SSC-6

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on March 14, 2025, at 10:00 a.m., in Department SSC-6 of
3 the Los Angeles County Superior Court, located at 312 N. Spring Street, Los Angeles, California,
4 Plaintiffs Blanca Villagomez, Sean Crane, Jennifer Beausoleil, Madison Palmer, and Denise Ord,
5 on behalf of themselves and the State of California by and through the Labor Workforce &
6 Development Agency, will and hereby do move the Court for an order granting approval of the
7 proposed settlement under the Private Attorneys General Act, Labor Code sections 2698, *et seq.*,
8 approving the payment of civil penalties to the State and the Aggrieved Employees, approving
9 Apex Class Action, LLC as the Settlement Administrator and payment of its fees in the amount
10 up to \$9,790.00, approving enhancement awards to Plaintiffs in the amount of \$5,000.00 each,
11 and approving payment of Plaintiffs' counsel's attorney's fees in the amount of \$260,000.00 and
12 costs in the amount of \$24,311.71.

13 This motion is brought under Labor Code section 2699(l)(2), and on the grounds that the
14 settlement is fair, reasonable and adequate and meets all requirements for approval under PAGA,
15 and the requested attorney's fees and costs are fair and reasonable under the circumstances of the
16 case.

17 This motion is based upon this Notice of Motion and Motion, the accompanying
18 memorandum of points and authorities, the Settlement Agreement, the accompanying
19 declarations of Nikki Trenner, Blanca Villagomez, Sean Crane, Jennifer Beausoleil, Madison
20 Palmer, Denise Ord, and Sean Hartranft, the entire Court file in this matter, and on such other
21 argument and evidence as may be presented at or before the hearing in this matter.
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24 Dated: February 7, 2025

Respectfully submitted,
CROSNER LEGAL, PC

25 By: 

26 Zachary M. Crosner
27 Jamie K. Serb
28 Nikki Trenner
Attorneys for Plaintiff BLANCA
VILLAGOMEZ