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Attorneys for Plaintiff JULIO C. ROVIRA,
On behalf of himself and all others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

JULIO C. ROVIRA, individually and on
behalf of himself and all others similarly
situated,

Plaintiff,

vs.

SILVERADO SENIOR LIVING
MANAGEMENTS, INC., a Delaware
Corporation, and DOES 1-50, inclusive,

Defendants.

Case No. 30-2020-01136565-CU-OE-CXC

Assigned for All Purposes To:

Hon. Lon F. Hurwitz

Dept.: CX-103

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR FINAL APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

Date: February 24, 2023

Time: 1:30 p.m.

Dept: Dept. CX-103

Date Action Filed: March 5, 2020

Trial Date: N/A

1 **TO DEFENDANT SILVERADO SENIOR LIVING MANAGEMENT, INC. AND TO ITS**
2 **ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE THAT** on February 24, 2023 at 1:30 p.m., or as soon
4 thereafter as the matter may be heard, in Department CX-103 of the above-captioned court,
5 located at Civil Complex Center 751 West Santa Ana Blvd., California 92701, before the
6 Honorable Lon F. Hurwitz, Plaintiffs Julio C. Rovira, Lorena Renteria, and Virgilio Santos,
7 individually, and on behalf of the members of the putative class they seek to represent, will and
8 hereby do move this Court to (1) grant final approval of the Settlement Agreement reached
9 between Plaintiffs and Defendant Silverado Senior Living Management, Inc. (“Defendant” or
10 “Silverado”) (collectively “the Parties”), the terms of which are set forth in the Stipulation of
11 Class Action and PAGA Settlement (the “Settlement Agreement”) attached as Exhibit A to the
12 supporting Declaration of James R. Hawkins (“Hawkins Declaration”); (2) certify the Settlement
13 Class for Settlement Purposes; (3) grant the requested settlement administration expenses to the
14 Settlement Administrator, ILYM Group, Inc., which administered the settlement; and (4) enter
15 final judgement substantially in the form of the proposed order submitted herewith.

16 The Settlement has been successfully administered, and good cause exists for granting the
17 Motion and finding the Settlement and settlement administration expenses to be fair, reasonable,
18 and appropriate.

19 This motion is brought pursuant to California Rule of Court 3.769 and California Code of
20 Civil Procedure section 382, and is based on this Notice of Motion and Motion; the Memorandum
21 of Points and Authorities in support of this Motion; the Declaration of James R. Hawkins; the
22 Declaration of Christina M. Lucio; the Declarations of Plaintiffs Julio C. Rovira, Lorena Renteria,
23 and Virgilio Santos; the Declaration of Cassandra Polites of ILYM Group, Inc., the Proposed
24 Order Granting Final Approval of Class Action Settlement and Judgement; all documents
25 currently on file in this action including without limitation those submitted in support of
26 preliminary approval; the arguments of counsel; and such other and further evidence as the Court
27 may choose to entertain.

This motion is set to be heard concurrently with Plaintiffs' Motion for Attorney's Fees and Costs, and Class Representatives Service Award.

Dated: February 1, 2023

Respectfully Submitted,

James Hawkins, APLC

By: /Christina M. Lucio/

James R. Hawkins

Christina M. Lucio

Attorneys for Plaintiffs and the Class