

Jamie K. Serb (SBN 289601)
jamie@crosnerlegal.com
Sepideh Ardestani, Esq. (SBN 274259)
sepideh@crosnerlegal.com
Zachary M. Crosner, Esq. (SBN 272295)
zach@crosnerlegal.com
CROSNER LEGAL, PC
9440 Santa Monica Blvd. Suite 301
Beverly Hills, CA 90210
Tel: (866) 276-7637
Fax: (310) 510-6429

Attorneys for Plaintiff
RHINA VILLEDADA

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

RHINA VILLEDADA, as an individual and on
behalf of all others similarly situated,

Plaintiff,

v.

SOLHEIM LUTHERAN HOME, a California
corporation; and DOES 1-100 inclusive,

Defendants.

CASE NO. 21STCV45430

Assigned for All Purposes to:
Hon. Lawrence P. Riff
Dept. SSC-7

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

Date: TBD
Time: 10:00 a.m.
Dept.: SSC-7

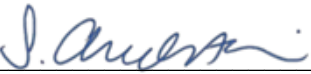
1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on a date to be determined by the Court, at 10:00 a.m., in
3 Department SSC-7 of the above-captioned Court, located at 312 N. Spring Street, Los Angeles,
4 California, plaintiff Rhina Villeda will move the Court for preliminary approval of a proposed
5 class action and PAGA settlement in the above-captioned action under Cal. Rule of Court 3.769.
6 The terms of the settlement are contained within the Class Action and PAGA Settlement
7 Agreement and Class Notice (the "Settlement Agreement"), filed concurrently herewith as
8 Exhibit 1 to the Declaration of Sepideh Ardestani. In addition, Plaintiff requests that the Court
9 conditionally certify the class described in the Settlement Agreement; approve the form of class
10 notice attached as Exhibit A to the Settlement Agreement; conditionally approve Crosner Legal
11 P.C. as Class Counsel and plaintiff Rhina Villeda as the Class Representative, approve
12 Simpluris, Inc. as the Settlement Administrator, and set a final approval hearing for April 14,
13 2025, or the first available date on the Court's calendar thereafter.

14 This motion will be based on this Notice of Motion and Motion, the accompanying
15 Memorandum of Points and Authorities, the Settlement Agreement, the accompanying
16 Declarations of Sepideh Ardestani, Rhina Villeda, and Eric Springer, the Court's entire file
17 herein, and on such further evidence and argument as may be presented at the hearing.

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19 Dated: November 18, 2024,

CROSNER LEGAL, P.C.

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21 By: 

22 Zachary M. Crosner, Esq.
23 Sepideh Ardestani, Esq.
24 Attorneys for Plaintiff
25 RHINA VILLEDA
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