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Attorneys for Plaintiffs Paola Uribe and Maria Soto

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF VENTURA**

PAOLA URIBE, individually, MARIA
SOTO, individually, and on behalf of
others similarly situated,
Plaintiffs,

vs.

MONROE OPERATIONS, LLC, (dba
Newport Healthcare, Newport Academy,
Newport Institute, and Center for
Families)), and DOES ONE through
TWENTY inclusive,
Defendants.

CASE NO.: **56-2021-00561341-CU-OE-VTA**

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

Hearing Date: May 31, 2024
Hearing Time: 8:30 a.m.

Judge: Hon. Mark S. Borrell
Dept.: 40

Action Filed: December 17, 2021
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on May 31, 2024 in
Department 40 at the above entitled Court before the Honorable Mark S. Borrell, Plaintiffs
Paola Uribe and Maria Soto ("Plaintiffs") will apply for an order: (1) preliminarily
approving the proposed settlement of this class action with Defendant Monroe Operations,

1 LLC (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class,
2 which is comprised of “all individuals who were employed by Defendant in California and
3 classified as a non-exempt employee at any time during the Class Period”, which is July 7,
4 2018 through January 7, 2024; (3) provisionally appointing Plaintiffs as the representatives
5 of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, and
6 Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP, Daniel F. Gaines
7 and Alex P. Katofsky of Gaines & Gaines, APLC, and Stan S. Mallison of Mallison &
8 Martinez as Class Counsel; (5) approving the form and method for providing class-wide
9 notice; (6) directing that notice of the proposed settlement be given to the class; (7)
10 appointing Apex Class Action LLC as Administrator, and (8) scheduling a final approval
11 hearing date, proposed for October 1, 2024 to consider Plaintiffs’ motion for final approval
12 of the settlement and for approval of attorneys’ fees and expenses.

13 This unopposed motion for preliminary approval of the class settlement is brought
14 pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this
15 notice of motion and motion, the accompanying memorandum of points and authorities, the
16 Declaration of Kyle Nordrehaug, the Declaration of Daniel Gaines, the Declaration of Stan
17 Mallinson, the Declarations of the Plaintiffs, the Class Action and PAGA Settlement
18 Agreement (“Agreement”) between the Parties, and the complete files and records in this
19 action. Because all Parties have agreed to the proposed class settlement, this motion is not
20 opposed by Defendant.

21
22 Respectfully submitted,

23 Dated: May 13, 2024

MALLISON & MARTINEZ

24
25 By: /s/ Stan Mallison
Stan S. Mallison, Esq.

26 Attorney for Plaintiffs
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