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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ORANGE

THANH PHAN, an individual, on behalf of
herself and on behalf of all persons similarly
situated,

Plaintiffs,

vs.

ST. JUDE MEDICAL CENTER, a California
Corporation; ST. JUDE HOSPITAL, a
California Corporation; and DOES 1 through 50,
inclusive,

Defendants.

MARK MORANVILLE, as an individual on
behalf of himself and on behalf of all others
similarly situated,

Plaintiff,

vs.

ST. JUDE HOSPITAL, a California
Corporation; ST. JUDE HERITAGE MEDICAL
GROUP, A MEDICAL CORPORATION, a
California Corporation; and DOES 1-100,
inclusive,

Defendants.

CASE No. **30-2022-01244478-CU-OE-CXC**
[Consolidated with Case No.
30-2022-01246853-CU-OE-CXC]

**NOTICE OF MOTION AND MOTION
FOR FINAL APPROVAL OF CLASS
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS AND
SERVICE AWARDS**

Hearing Date: September 13, 2024
Hearing Time: 9:00 a.m.

[Hearing scheduled by Order dated April 5,
2024]

Judge: Hon. William D. Cluster
Dept.: CX101

Action Filed: February 8, 2022
Trial Date: Not set

1 **TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on September 13, 2024, or as soon
3 thereafter as the matter can be heard Department CX101 at the above-entitled Court before the
4 Honorable William D. Claster, Plaintiffs Thanh Phan and Mark Moranville (“Plaintiffs”) will move for
5 an order granting (1) Final Approval of the Class Action Settlement, including approval of the attorneys’
6 fees, costs and service awards, and (2) Entry of the Final Approval Order and the Judgment.

7 This motion is brought in accordance with the Order dated April 5, 2024, and California Rules
8 of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and authorities,
9 the Declaration of Norman Blumenthal, the Declaration of Sepideh Ardestani, the First Amended Class
10 Action and PAGA Settlement Agreement (the “Agreement”), the Declaration of Nicole Bench (the
11 Administrator), the Declarations of Plaintiffs Thanh Phan and Mark Moranville, and the complete files
12 and records in this action.

13 Because Plaintiffs and Defendant St. Jude Hospital dba St. Jude Medical Center (“Defendant”)
14 have agreed to the proposed class settlement and have met and conferred regarding the motion, this
15 motion is not opposed. There have been no objections submitted by the Class.

16 Respectfully submitted,

17 Dated: August 21, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

18 By: /s/ Kyle Nordrehaug
19 Kyle R. Nordrehaug, Esq.
20 Attorneys for Plaintiffs
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