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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF VENTURA

PAOLA URIBE, MARIA SOTO,
KAREN HART, WILSON CHUNG, and
LISA BURTON, individuals, on behalf of
themselves, all persons similarly situated,
aggrieved employees, and the State of
California,

Plaintiffs,

vs.

MONROE OPERATIONS, LLC, dba
NEWPORT HEALTHCARE and
NEWPORT ACADEMY and 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

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on May 31, 2024 in
3 Department 40 at the above entitled Court before the Honorable Mark S. Borrell, Plaintiffs
4 Paola Uribe, Maria Soto, Karen Hart, Wilson Chung, and Lisa Burton (“Plaintiffs”) will
5 apply for an order: (1) preliminarily approving the proposed settlement of this class action
6 with Defendant Monroe Operations, LLC (“Defendant”); (2) for settlement purposes only,
7 conditionally certifying the Class, which is comprised of “all individuals who were
8 employed by Defendant in California and classified as a non-exempt employee at any time
9 during the Class Period”, which is July 7, 2018 through January 7, 2024; (3) provisionally
10 appointing Plaintiffs as the representatives of the Class; (4) provisionally appointing
11 Norman B. Blumenthal, Kyle R. Nordrehaug, and Aparajit Bhowmik of Blumenthal
12 Nordrehaug Bhowmik De Blouw LLP, Daniel F. Gaines and Alex P. Katofsky of Gaines &
13 Gaines, APLC, and Stan S. Mallison of Mallison & Martinez as Class Counsel; (5)
14 approving the form and method for providing class-wide notice; (6) directing that notice of
15 the proposed settlement be given to the class; (7) appointing Apex Class Action LLC as
16 Administrator, and (8) scheduling a final approval hearing date, proposed for October 1,
17 2024 to consider Plaintiffs’ motion for final approval of the settlement and for approval of
18 attorneys’ fees and expenses.

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

Dated: May 6, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

By: /s/ Kyle Nordrehaug
Kyle R. Nordrehaug, Esq.
Attorney for Plaintiffs