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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

LINDSEY SUMNICHT, ZOLA
STAMPER, and FARRAH ALIZADEH,
individuals, on behalf of themselves and
on behalf of all persons similarly situated,

Plaintiffs,

vs.

AMN SERVICES, LLC, a Limited
Liability Company; and DOES 1 through
50, inclusive,

Defendants.

CASE NO.: **22CV397191**

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

Hearing Date: January 7, 2026

Hearing Time: 1:30 p.m.

Judge: Hon. Theodore C. Zayner

Dept.: 19

Action Filed: April 22, 2022

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on January 7, 2026 at 1:30 p.m., in
Department 19 of the above entitled Court before the Honorable Theodore C. Zayner,

1 Plaintiffs Lindsey Sumnicht, Zola Stamper, and Farrah Alizadeh (“Plaintiffs”) will move for
2 an order: (1) preliminarily approving the proposed settlement of this class action with
3 Defendant AMN Services, LLC (“Defendants”); (2) for settlement purposes only,
4 conditionally certifying the Class, which is comprised of “all of Defendant's non-exempt
5 employees who were assigned to work at any facility in California at any time during the
6 Class Period”, which July 8, 2021 through September 17, 2025; (3) provisionally appointing
7 Plaintiffs as the representatives of the Class; (4) provisionally appointing Blumenthal
8 Nordrehaug Bhowmik De Blouw LLP and Haines Law Group APC as Class Counsel for the
9 Class; (5) approving the form and method for providing notice to the Class of the proposed
10 settlement; (6) directing that notice of the proposed settlement be given to the Class; (7)
11 appointing Apex Class Action as the Administrator; and (8) scheduling a final approval
12 hearing date, proposed for June 3, 2026, to consider the Plaintiffs’ motion for final approval
13 of the settlement and for approval of attorneys’ fees, expenses and the service awards.

14 This motion for preliminary approval of the class settlement is brought pursuant to
15 California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this notice of
16 motion and motion, the accompanying memorandum of points and authorities, the
17 Declaration of Kyle Nordrehaug, the Declaration of _____, the Declarations of
18 the Plaintiffs, the Class Action and PAGA Settlement Agreement (the “Agreement”)
19 between the parties, and the complete files and records in this action. Because all Parties
20 have agreed to the proposed class settlement, this motion is unopposed.

21 Respectfully submitted,

22 Dated: December 10, 2025 **BLUMENTHAL NORDREHAUG BHOWMIK**
DE BLOUW LLP

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