

1 **BLUMENTHAL NORDREHAUG BHOWMIK**
2 **DE BLOUW LLP**

3 Norman B. Blumenthal (State Bar #068687)

4 Kyle R. Nordrehaug (State Bar #205975)

5 Aparajit Bhowmik (State Bar #248066)

6 Jeffrey S. Herman (State Bar #280058)

7 2255 Calle Clara

8 La Jolla, CA 92037

9 Telephone: (858)551-1223

10 Facsimile: (858) 551-1232

11 Website: www.bamlawca.com

12 Attorneys for Plaintiff

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN DIEGO

GLORIA GUINILING, an individual, on
behalf of herself, on behalf of all persons
similarly situated,

Plaintiff,

vs.

ESCONDIDO MEDICAL INVESTORS
LIMITED PARTNERSHIP LIFE CARE
CENTER OF ESCONDIDO, a Limited
Partnership; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 37-2022-00019520-CU-OE-CTL

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

Hearing Date: January 12, 2024

Hearing Time: 9:00 a.m.

*[Hearing scheduled by Order dated August
18, 2023]*

Judge: Hon. Matthew C. Braner

Dept.: 60

Action Filed: May 23, 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 January 12, 2024 or as soon
3 thereafter as the matter can be heard, in Department 60 of the above-entitled Court before the
4 Honorable Matthew C. Braner, Plaintiff Gloria Guiniling (“Plaintiff”) will move for an order
5 granting (1) Final Approval of the Class Action Settlement and the Attorneys’ Fees, Costs and
6 Service Award, and (2) Entry of the Final Approval Order and the Judgment.

7 This motion is brought in accordance with the Order dated August 18, 2023, and
8 California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Declaration of Norman Blumenthal, the Class Action
10 and PAGA Settlement Agreement (the “Agreement”), the Declaration of Nick Castro (the
11 Administrator), the Declaration of Gloria Guiniling, and the complete files and records in this
12 action.

13 Because Plaintiff and Defendant Escondido Medical Investors Limited Partnership Life
14 Care Center of Escondido (“Defendant”) have agreed to the proposed class settlement and have
15 met and conferred regarding the motion, this motion is not opposed. There have been no
16 objections submitted by the Class.

17 Respectfully submitted,

18 Dated: December 15, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

20 By: /s/ Kyle Nordrehaug
21 Norman B. Blumenthal, Esq.
22 Kyle R. Nordrehaug, Esq.

23 Attorneys for Plaintiff
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