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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **IN AND FOR THE COUNTY OF SAN FRANCISCO**

15 KAYCIE CROSSLEY, an individual, on
16 behalf of herself, and on behalf of all
17 persons similarly situated,

18 Plaintiff,

19 vs.

20 CEREBRAL MEDICAL GROUP, P.A.,
21 a Profesional Association; CEREBRAL
22 MEDICAL GROUP, A
23 PROFESSIONAL CORPORATION, a
24 Professional Corporation, and DOES 1
25 through 50, inclusive,

26 Defendants.

Case No. CGC-22-599132

[Consolidated with Case No. CGC-22-600627]

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

Hearing Date: May 31, 2023

Hearing Time: 9:30 a.m.

Judge: Hon. Richard B. Ulmer
Dept: 302

Action Filed: December 28, 2021

Trial Date: Not Set

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

28 YOU ARE HEREBY NOTIFIED THAT on May 31, 2023 at 9:30 a.m., in
Department 302 of the above entitled Court before the Honorable Richard B. Ulmer,
Plaintiff Kaycie Crossley ("Plaintiff") will apply for an order: (1) preliminarily approving

1 the proposed settlement of this class action with Defendants Cerebral Medical Group, P.A.
2 and Cerebral Medical Group, A Professional Corporation (“Defendants”); (2) for settlement
3 purposes only, conditionally certifying the Class, which is comprised of “all individuals who
4 work or previously worked for Defendants in California and were classified as an
5 independent contractor at any time during the Class Period” of April 11, 2018 through April
6 24, 2023; (3) provisionally appointing Plaintiff as the representative of the Class; (4)
7 provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik;
8 Nicholas J. De Blouw, Jeffrey S. Herman, and Sergio J. Puche of Blumenthal Nordrehaug
9 Bhowmik De Blouw LLP as Class Counsel for the Class; (5) approving the form and
10 method for providing class-wide notice; (6) directing that notice of the proposed settlement
11 be given to the Class; (7) appointing ILYM Group as the Administrator; and (8) scheduling
12 a final approval hearing date proposed for October 5, 2023 to consider Plaintiff’s motion for
13 final approval of the settlement and entry of the Judgment, and Plaintiff’s motion for
14 approval of attorneys' fees and expenses.

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

22 Respectfully submitted,

23 Dated: May 3, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

24 By: /s/ Kyle Nordrehaug
25 Norman B. Blumenthal, Esq.
26 Kyle R. Nordrehaug, Esq.
27 Attorney for Plaintiff
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