

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Email: Kyle@bamlawca.com
Website: www.bamlawca.com

James R. Hawkins, Esq. (State Bar #192925)
JAMES HAWKINS APLC
9880 Research Drive, Suite 200
Irvine, CA 92618
TEL: (949) 387-7200
FAX: (949) 387-6676
Email: james@jameshawkinsaplc.com

Joseph Lavi, Esq. (State Bar #209776)
LAVI & EBRAHIMIAN, LLP
8889 W. Olympic Boulevard, Suite 200
Beverly Hills, California 90211
Telephone: (310) 432-0000
Facsimile: (310) 432-0001
Email: jlavi@lelawfirm.com

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SACRAMENTO**

ERIK HUFFMAN, NAJUAH MUDAHY,
INA ROSSON, JOANNE RODELLE
LAWHORN and MANUAL JOSEPH
ORTEGON, individuals, on behalf of
themselves and on behalf of all persons
similarly situated and on behalf of the State of
California, as private attorney general,

Plaintiffs,

vs.

CENTENE MANAGEMENT COMPANY
LLC, a Limited Liability Company; HEALTH
NET, LLC, a Limited Liability Company and
DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **34-2022-00322629-CU-OE-GDS**

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

Hearing Date: March 14, 2025
Hearing Time: 9:00 a.m.
Reservation ID # **A-322629-001**

Judge: Hon. Lauri A. Damrell
Dept: 22

Date Filed: June 29, 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 March 14, 2025 in Department 22
3 at the above entitled Court before the Honorable Lauri A. Damrell, Plaintiffs Erik Huffman, Najuah
4 Mudahy, Ina Rosson, Joanne Rodelle Lawhorn and Manuel Joseph Ortegon (“Plaintiffs”) will apply
5 for an order: (1) preliminarily approving the proposed settlement of this class action with
6 Defendants Centene Management Company, LLC and Health Net, LLC (“Defendants”); (2) for
7 settlement purposes only, conditionally certifying the Class, which is comprised of “all individuals
8 who were employed by Defendants Centene Management Company, LLC or Health Net, LLC in
9 California and classified as a non-exempt employee at any time during the Class Period, excluding
10 all those who previously released their claims in prior settlements, except for Plaintiff Erik
11 Huffman”, which is June 29, 2018 through December 31, 2024; (3) provisionally appointing
12 Plaintiffs as the representatives of the Class; (4) provisionally appointing Blumenthal Nordrehaug
13 Bhowmik De Blouw LLP, Lavi & Ebrahimian, LLP, and James Hawkins, APLC as Class Counsel;
14 (5) approving the form and method for providing class-wide notice; (6) directing that notice of the
15 proposed settlement be given to the class; (7) appointing Apex Class Action LLC as Administrator,
16 and (8) scheduling a final approval hearing date, proposed for August 1, 2025 which is at least 120
17 days from preliminary approval, to consider Plaintiffs’ motion for final approval of the settlement
18 and for approval of attorneys’ fees and expenses.

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

26 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this
27 matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative ruling may
28 be downloaded off the court's website. If the party does not have online access, they may call the

1 dedicated phone number for the department as referenced in the local telephone directory between
2 the hours of 2:00 p.m. and 4:00 p.m. on the court day before the hearing and receive the tentative
3 ruling. If you do not call the court and the opposing party by 4:00 p.m. the court day before the
4 hearing, no hearing will be held.

5 Respectfully submitted,

6 Dated: February 18, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

7 By: /s/ Kyle Nordrehaug
8 Kyle R. Nordrehaug, Esq.
9 Attorney for Plaintiffs
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28