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on behalf of herself and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

CYNTHIA WILLIAMS, individual on
behalf of herself and others similarly
situated,

Plaintiff,

vs.

ALHAMBRA HOSPITAL MEDICAL
CENTER L.P., a California limited
partnership, and DOES 1 through 50,
inclusive,

Defendants.

Case No.: 23STCV29202

CLASS ACTION

Assigned for All Purposes
Hon. Carolyn B. Kuhl
Dept.: 12

**NOTICE OF MOTION AND PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS AND PAGA
ACTION SETTLEMENT AGREEMENT**

*[Filed concurrently with Memorandum of Points
and Authorities; Declarations of Enoch J. Kim
and Cynthia Williams; and [Proposed] Order
Granting Plaintiff's Motion for Preliminary
Approval]*

Date: June 5, 2025
Time: 10:30 a.m.
Dept.: 12

Original Complaint: November 30, 2023
First Amended Complaint: March 26, 2024
Second Amended Complaint: March 17, 2025
Trial Date: None Set

1 **TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on June 5, 2025 at 10:30 a.m. in Department 12 of the Los
3 Angeles Superior Court located at 312 North Spring Street, Los Angeles, CA 90012, Plaintiff
4 Cynthia Williams (“Plaintiff”), on behalf of herself and other similarly situated employees of
5 Defendant Alhambra Hospital Medical Center L.P. (“Defendant”) (collectively, “the Parties”), will
6 and hereby does move this Court pursuant to California Code of Civil Procedure § 382 and
7 California Rule of Court 3.769 for an order as proposed:

8 1. Preliminarily approving the proposed class-wide settlement of this action as set
9 forth in the Parties’ Class and PAGA Action Settlement Agreement and Release (“Settlement
10 Agreement”), which is attached as Exhibit 1 to the Declaration of Enoch J. Kim (“Kim Decl.”),
11 filed herewith;

12 2. Approving the form and method for providing notice to the Class Members and
13 approving the form and content of the Parties’ proposed Notice of Class and PAGA Settlement
14 (“Class Notice”) for sending to the Class Members (provided at Exhibit A to the Settlement
15 Agreement (which is attached as Exhibit 1 to the Declaration of Enoch J. Kim));

16 3. Approving for mailing the Class Notice packet, consisting of the Court approved
17 Class Notice and directing that it be sent to the Class Members;

18 4. Appointing Plaintiff Cynthia Williams as Class Representative for settlement
19 purposes only;

20 5. Appointing Emil Davtyan, David Yeremian, Alvin B. Lindsay, Enoch J. Kim, and
21 Melissa Rodriguez of D.Law, Inc. as Class Counsel for settlement purposes only.

22 6. Scheduling a Final Approval hearing date to consider the Parties’ request for Final
23 Approval of the proposed Settlement and Plaintiff’s application for Class Counsel Award to Class
24 Counsel for attorneys’ fees and reasonable expenses incurred in connection with this Action, and
25 Class Representative Enhancement and Service Award to Plaintiff for the service in this Action.

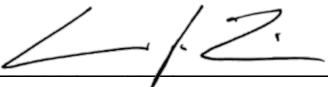
26 7. Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the
27 proposed settlement’s allocation of funds to claims made under Labor Code §§ 2698, *et seq.*, the
28 Private Attorneys General Act of 2004 (“PAGA”).

1 This Motion is made on the grounds that after good-faith, arm's length negotiations, the
2 Parties have agreed upon a Settlement which is fair, reasonable, and adequate and in the best
3 interests of the Class and all Parties. Defendant does not oppose the Motion. This Notice of
4 Motion and Motion is also based on the fact that this Settlement was the product of informed, non-
5 collusive negotiations by the Parties, who were represented by experienced and able counsel. See
6 *Dunk v. Ford Motor Co.* (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation
7 (Second) (1985) § 30.44. The proposed settlement meets the legal standard for preliminary
8 approval and is in the best interests of the Class; the proposed form of Class Notice explains the
9 Settlement terms in a clear and straightforward manner; the proposed procedures for notice
10 provide the best practical notice to the Class; and Class Members will have an opportunity to
11 participate in and/or object to the settlement and/or opt-out of the settlement.

12 This Motion is based upon this Notice of Motion, the accompanying Memorandum of
13 Points and Authorities, the Declarations of Enoch J. Kim and Plaintiff Cynthia Williams, the
14 [Proposed] Order granting Plaintiff's Motion for Preliminary Approval of the Class and PAGA
15 Action Settlement Agreement, the Parties' Settlement Agreement and Class Notice, the Court's
16 record of this action, all matters of which the Court may take notice, and upon such oral or
17 documentary evidence as the Court may receive at or before the hearing on this unopposed
18 Motion.

19
20 DATED: March 17, 2025

D.LAW, INC.

21 By 
22 David Yeremian
23 Alvin B. Lindsay
24 Enoch J. Kim
25 Melissa Rodriguez
26 Attorneys for Plaintiff and Settlement Class
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