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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

ERICA MORRIS, YOLANDA
ORTEGA-CALBERT, MARIBEL
BLANDINO, and DORETHA HUGHES,
individually, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

THE PERMANENTE MEDICAL GROUP,
INC., a California Corporation; and DOES 1
through 50, inclusive,

Defendants.

CASE NO.: **34-2022-00332012-CU-OE-GDS**

[Consolidated with Case No. 34-2022-00332023-
CU-OE-GDS]

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

Hearing Date: April 18, 2025

Hearing Time: 9:00 a.m.

Reservation # **A-332012-001**

Judge: Hon. Jill H. Talley

Dept: 23

Date Filed: December 28, 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 April 18, 2025 in Department 23 at
3 the above entitled Court before the Honorable Jill H. Talley, Plaintiffs Erica Morris, Yolanda
4 Ortega-Calbert, Maribel Blandino, and Doretha Hughes (“Plaintiffs”) will apply for an order:
5 (1) preliminarily approving the proposed settlement of this class action with Defendant The
6 Permanente Medical Group, Inc. (“Defendant”) and approving the PAGA settlement; (2) for
7 settlement purposes only, conditionally certifying the Class, which is comprised of “all non-exempt
8 persons who were employed by Defendant in the State of California at any time during the Class
9 Period,” which is January 1, 2021 through December 31, 2024; (3) provisionally appointing
10 Plaintiffs as the Class Representatives for this Class; (4) provisionally appointing Blumenthal
11 Nordrehaug Bhowmik De Blouw LLP, James Hawkins APLC, and Haffner Law PC as Class
12 Counsel; (5) approving the form and method for providing class-wide notice; (6) directing that
13 notice of the proposed settlement be given to the class; (7) appointing ILYM Group, Inc. as the
14 Administrator, and (8) scheduling a final approval hearing date, proposed for September 5, 2025, to
15 consider Plaintiffs’ motion for final approval of the settlement and for approval of attorneys’ fees
16 and expenses.

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

24 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this
25 matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative ruling may
26 be downloaded off the court's website. If the party does not have online access, they may call the
27 dedicated phone number for the department as referenced in the local telephone directory between
28 the hours of 2:00 p.m. and 4:00 p.m. on the court day before the hearing and receive the tentative

1 ruling. If you do not call the court and the opposing party by 4:00 p.m. the court day before the
2 hearing, no hearing will be held.

3 Respectfully submitted,

4 Dated: March 24, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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

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