

MALLISON & MARTINEZ
Stan S. Mallison (SBN 184191)
StanM@TheMMLawFirm.com
1939 Harrison Street, Suite 730
Oakland, California 94612-3547
Telephone: (510) 832-9999
Facsimile: (510) 832-1101
Attorneys for Plaintiffs Paola Uribe and Maria Soto

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**
Norman B. Blumenthal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
Aparajit Bhowmik (State Bar #248066)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Website: www.bamlawca.com
Email: Kyle@bamlawca.com
Attorneys for Plaintiffs Wilson Chung and Lisa Burton

GAINES & GAINES, APLC
Daniel F. Gaines, Esq. (SBN 251488)
daniel@gaineslawfirm.com
27200 Agoura Rd., Suite 101
Calabasas, CA 91301
Telephone: (818) 703-8985
Facsimile: (818) 703-8984
Attorneys for Plaintiff Karen Hart

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

PAOLA URIBE, MARIA SOTO, KAREN
HART, WILSON CHUNG, and LISA
BURTON, individuals, on behalf of
themselves, all persons similarly situated,
aggrieved employees, and the State of
California
Plaintiffs,

vs.

MONROE OPERATIONS, LLC, dba
NEWPORT HEALTHCARE and
NEWPORT ACADEMY and NEWPORT
INSTITUTE and CENTER FOR
FAMILIES, and DOES ONE through
TWENTY inclusive,
Defendants.

CASE No. **56-2021-00561341-CU-OE-VTA**

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

Hearing Date: January 21, 2025

Hearing Time: 8:20 a.m.

*[Hearing scheduled by Orders dated July 1, 2024
and October 16, 2024]*

Judge: Hon. Mark S. Borrell

Dept.: 40

Action Filed: December 17, 2021

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:20 a.m. on January 21, 2025, or as soon thereafter
3 as the matter can be heard Department 40 at the above-entitled Court before the Honorable Mark S.
4 Borrell, Plaintiffs Paola Uribe, Maria Soto, Karen Hart, Wilson Chung, and Lisa Burton ("Plaintiffs")
5 will move for an order granting (1) Final Approval of the Class Action Settlement, including approval
6 of the attorneys' fees, costs and service awards, and (2) Entry of the Final Approval Order and the
7 Judgment.

8 This motion is brought in accordance with the Orders dated July 1, 2024 and October 16, 2024,
9 and California Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying
10 points and authorities, the Declaration of Norman Blumenthal, the Declaration of Daniel Gaines, the
11 Declaration of Stan Mallinson, the Class Action and PAGA Settlement Agreement (the "Agreement"),
12 the Declaration of Kevin Lee (the Administrator), the Declarations of Plaintiffs Paola Uribe, Maria
13 Soto, Karen Hart, Wilson Chung, and Lisa Burton, and the complete files and records in this action.

14 Because Plaintiffs and Defendant Monroe Operations, LLC ("Defendant") have agreed to the
15 proposed class settlement and have met and conferred regarding the motion, this motion is not opposed.
16 There have been no objections submitted by the Class.

17 Respectfully submitted,

18 Dated: December 26, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

19 By: /s/ Kyle Nordrehaug
20 Kyle R. Nordrehaug, Esq.
21 Attorneys for Plaintiffs
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