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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SONOMA

DORIS VANESSA JACOBY, an
individual, on behalf of herself, and on
behalf of all persons similarly situated,

Plaintiff,

vs.

NORCAL HEALTHCONNECT, LLC, a
Limited Liability Company; and DOES 1
through 50, inclusive,

Defendants.

Case No. SCV-271141

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

Hearing Date: June 26, 2024
Hearing Time: 3:00 p.m.

Judge: Hon. Bradford DeMeo
Dept: 17

Date Filed: July 8, 2022
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on June 26, 2024 at 3:00 p.m., in
Department 17 of the above entitled Court before the Honorable Bradford DeMeo, Plaintiff
Doris Vanessa Jacoby ("Plaintiff") will move for an order: (1) preliminarily approving the

1 proposed settlement of this class action with Defendant NorCal HealthConnect, LLC
2 (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class, which
3 consists of both the Wage and Hour Class and the Background Check Class; (3)
4 provisionally appointing Plaintiff as the representatives of the Class; (4) provisionally
5 appointing Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik, Nicholas J. De
6 Blouw, Jeffrey S. Herman, and Sergio J. Puche of Blumenthal Nordrehaug Bhowmik De
7 Blouw LLP as Class Counsel for the Class; (5) approving the form and method for providing
8 notice to the Class of the proposed settlement; (6) directing that notice of the proposed
9 settlement be given to the Class; (7) appointing ILYM Group as the Administrator; and
10 (8) scheduling a final approval hearing date for November 6, 2024 to consider the Plaintiff’s
11 motion for final approval of the settlement and for approval of attorneys’ fees, expenses and
12 the service award.

13 This motion for preliminary approval of the class settlement is brought pursuant to
14 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of
15 motion and motion, the accompanying memorandum of points and authorities, the
16 Declaration of Kyle Nordrehaug, the Declaration of Plaintiff Doris Vanessa Jacoby, the
17 Class Action and PAGA Settlement Agreement (the “Agreement”) between the parties, and
18 the complete files and records in this action. Because all Parties have agreed to the proposed
19 class settlement, this motion is unopposed.

20 Respectfully submitted,

21 Dated: June 3, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

22 By: /s/ Kyle Nordrehaug
23 Kyle R. Nordrehaug, Esq.
24 Attorney for Plaintiff
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