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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
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13 MARIA CHONA RODRIGUEZ, an
14 individual, on behalf of herself, and on
15 behalf of all persons similarly situated,

16 Plaintiff,

17 vs.

18 EL TORO MEDICAL INVESTORS
19 LIMITED PARTNERSHIP, a Limited
20 Partnership; LIFE CARE CENTERS
OF AMERICA, INC., a Corporation;
and DOES 1 through 50, inclusive,

21 Defendants.
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CASE No. **8:16-CV-00059-JLS-KES**

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

Judge: Hon. Josephine L. Staton

Hearing Date: December 8, 2017
Hearing Time: 2:30 p.m.

Action Filed: January 15, 2016

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

2 **PLEASE TAKE NOTICE THAT** on December 8, 2017, at 2:30 p.m. in the
3 United States District Court for the Central District of California, located at the
4 Ronald Reagan Federal Building and United States Courthouse, 411 W. Fourth St.,
5 Santa Ana, CA, 92701, in Courtroom 10A before the Honorable Josephine L.
6 Stanton, Plaintiff Maria Rodriguez ("Plaintiff") will move for preliminary approval of
7 the proposed Class Settlement with defendant El Toro Medical Investors, L.P. and
8 defendant Life Care Centers of America, Inc. ("Defendants"). This motion is
9 unopposed as based on the Class Action Settlement Agreement ("Agreement")
10 between the parties filed concurrently with this motion.

11 The motion will be based on this Notice of Motion and the attached
12 Memorandum of Points and Authorities filed herewith, the Declaration of Kyle
13 Nordrehaug and attached exhibits, the argument of counsel and upon such other
14 material contained in the file and pleadings of this action. Because all parties have
15 agreed to the settlement, this motion is not opposed by any party.

16 Pursuant to Local Rule 7-3, the parties engaged in a pre-filing conference on
17 September 27, 2017 in which the parties agreed on the filing of the unopposed
18 motion.

19 Respectfully submitted,

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21 Dated: October 10, 2017

BLUMENTHAL, NORDREHAUG & BHOWMIK

22 By: /s/ Kyle Nordrehaug
23 Norman B. Blumenthal
24 Kyle R. Nordrehaug
25 Attorneys for Plaintiff
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