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Attorneys for Plaintiff MICHAEL RUNYON,
on behalf of himself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN DIEGO

MICHAEL RUNYON, on behalf of himself and others similarly situated, Plaintiff, v. OPERATION SAMAHAN HEALTH, an entity of unknown form; SAMAHAN HEALTHCARE, an entity of unknown form; OPERATION SAMAHAN, INC. dba SAMAHAN HEALTH CENTERS, a California nonprofit corporation; and DOES 1 through 50, inclusive, Defendants.	Case No. 37-2023-00051071-CU-OE-CTL CLASS ACTION Assigned For All Purposes To: Hon. Euketa Oliver Dept.: C-75 **NOTICE OF MOTION AND PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT** *[filed concurrently with Memorandum of Points and Authorities; Declarations of Enoch J. Kim, Kimberly Sutherland, Michael Runyon, and Aurora Itzel Hurtado; and [Proposed] Order]* Date: April 23, 2027 Time: 10:00 a.m. Dept.: C-75 Reservation No.: 105478 Original Complaint Filed: November 21, 2023 Trial Date: None Set

TO THE COURT, DEFENDANT, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on April 23, 2027, at 10:00 a.m. in Department C-75 of the San Diego County Superior Court located at 330 West Broadway, San Diego, California 92101, Plaintiffs Michael Runyon and Aurora Itzel Hurtado ("Plaintiffs"), on behalf of themselves and other similarly situated employees of Defendant Operation Samahan, Inc., dba OpSam Health ("Defendant") (collectively, "the Parties"), will and hereby move this Court pursuant to California Code of Civil Procedure § 382 and California Rule of Court 3.769 for an order as proposed:

1. Preliminarily approving the proposed class-wide settlement of this action as set forth in the Parties' Class Action and PAGA Settlement Agreement ("Settlement Agreement"), which is attached as **Exhibit 1** to the Declaration of Enoch J. Kim ("Kim Decl."), filed concurrently herewith;

2. Approving the form and method for providing notice to the Class Members and approving the form and content of the Parties' proposed Court Approved Notice of Class Action Settlement and Hearing Date for Final Court Approval ("Class Notice") for sending to the Class Members (provided at **Exhibit A** to the Settlement Agreement);

3. Approving for mailing the Court approved Class Notice and directing that it be sent to the Class Members;

4. Appointing Plaintiffs Michael Runyon and Aurora Itzel Hurtado as Class Representatives for settlement purposes only;

5. Appointing D.Law, Inc. as Class Counsel for settlement purposes only.

6. Scheduling a Final Approval hearing date to consider the Parties' request for Final Approval of the proposed Settlement and Plaintiffs' application for Class Counsel Fees Payment to Class Counsel for attorneys' fees, Class Counsel Litigation Expenses Payment to Class Counsel for reasonable expenses incurred in connection with this Action, and Class Representative Service Payment to Plaintiffs for their services in this Action.

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

This Motion is made on the grounds that, after good-faith, arm's-length negotiations, the

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

This Motion is based upon this Notice of Motion, the accompanying Memorandum of Points and Authorities, the Declaration of Class Counsel Enoch J. Kim, the Declarations of Kimberly Sutherland and Plaintiffs Michael Runyon and Aurora Itzel Hurtado submitted with this Motion, the [Proposed] Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement, the Court's record of this action, all matters of which the Court may take notice, and upon such oral or documentary evidence as the Court may receive at or before the hearing on this unopposed Motion.

DATED: October 19, 2026

D.LAW, INC.

By _____
Enoch J. Kim
Arianna N. Razi
Attorneys for Plaintiffs and Class