

AEGIS LAW FIRM, PC

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Attorneys for Plaintiff Lisa Medlock, individually,
and on behalf of all others similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

LISA MEDLOCK, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

BLUE SHIELD OF CALIFORNIA; TALENT
TECHNICAL SERVICES, INC.; and DOES 1
through 20, inclusive,

Defendants.

Case No. CGC-22-600992

*Assigned for all purposes to:
Hon. Ethan P. Schulman, Dept. 304*

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR PRELIMINARY APPROVAL
OF CLASS AND REPRESENTATIVE
ACTION SETTLEMENT**

Date: July 24, 2024

Time: 9:00am

Dept: 304

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

2 PLEASE TAKE NOTICE that on July 24, 2024 at 9:00 a.m., or as soon thereafter as the matter
3 may be heard in Department 304 of the above-entitled Court located at 400 McAllister Street, San
4 Francisco California 94102, Plaintiff Lisa Medlock (“Plaintiff”) will and hereby does move this Court
5 for an Order:

- 6 1. Granting preliminary approval of the proposed CLASS ACTION AND PAGA
7 SETTLEMENT AGREEMENT AND CLASS NOTICE (“Settlement Agreement” or
8 “Agreement”);
- 9 2. Conditionally certifying the proposed Class for settlement purposes only;
- 10 3. Appointing Plaintiff Lisa Medlock as the Class Representative;
- 11 4. Appointing Aegis Law Firm, PC as Class Counsel;
- 12 5. Preliminarily approving Class Counsel attorneys’ fees of up to \$76,666.67, and Class
13 Counsel litigation expenses not to exceed \$15,000;
- 14 6. Appointing Phoenix Settlement Administrators, Inc. as the Settlement Administrator and
15 authorizing Phoenix Settlement Administrators, Inc. to send notice of the Settlement to the
16 Class Members; and
- 17 7. Setting a final approval hearing date.

18 Pursuant to California Rules of Court 3.769(d) and (e), the Motion is made on the grounds that the
19 proposed Settlement Agreement satisfies all criteria for preliminary approval under California law and
20 falls well within the range of reasonableness; the Agreement was reached through informed, arms-
21 length bargaining between experienced attorneys, and Plaintiff and Class Counsel will fairly and
22 adequately represent the Class Members.

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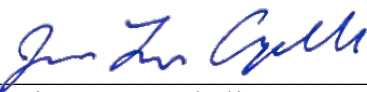
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1 The Motion is based on this Notice of Motion, Plaintiff's Motion for Preliminary Approval of
2 Class Action Settlement, the Declaration of Jessica L. Campbell, the Declaration of Lisa Medlock, the
3 Declaration of Jodey Lawrence, and on all records and documents on file, together with such oral and
4 documentary evidence that may be presented at the hearing on this matter.

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6 Dated: June 6, 2024

AEGIS LAW FIRM, PC

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8 By: 
9 Jessica L. Campbell
10 Attorneys for Plaintiff
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