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Attorneys for Plaintiff
ANDREA PRIOR

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LAKE**

ANDREA PRIOR on behalf of herself, and all
aggrieved employees,

Plaintiff,

v.

ADVENTIST HEALTH CLEARLAKE
HOSPITAL, INC.; and DOES 1 through 10,
inclusive,

Defendants.

Case No: CV 423216

REPRESENTATIVE ACTION

**NOTICE OF MOTION AND MOTION
FOR AN ORDER APPROVING
SETTLEMENT OF PAGA ACTION AND
DISMISSING ACTION WITH PREJUDICE**

Date: August 19, 2024

Time: 9:00 a.m.

Dept. 1

Complaint filed: October 21, 2022

Trial: Not set

PLEASE TAKE NOTICE THAT on August 19, 2024 at 9:00 a.m., or as soon thereafter as the matter may be heard, in Department 1 of the above-entitled Court, located at 255 North Forbes Street, Lakeport, California 95453, Plaintiff Andrea Prior (“Plaintiff”), will and hereby does move unopposed for an Order: (1) granting approval, pursuant to California Labor Code § 2699(1)(2), of the proposed settlement of claims brought pursuant to the Labor Code Private Attorneys General Act of 2004 (Labor Code §§ 2698 *et seq.*) against Defendant Adventist Health Clearlake Hospital, Inc. set forth in the parties’ Labor Code Private Attorneys General Act Settlement Agreement (the “Settlement Agreement”); (2) appointing Simpluris, Inc. as the Settlement Administrator; and (3) directing disbursement of the Settlement Amount pursuant to the terms of the Settlement Agreement.

This motion will be based on this Notice, the supporting memorandum of points and authorities, the Settlement Agreement, the Declarations of Eric A. Grover and Robert Spencer, the documents and records on file in this matter, and such additional arguments, authorities, and evidence and other matters as may be presented by the Parties hereafter.

Dated: July 19, 2024

KELLER GROVER LLP

By: _____



ERIC A. GROVER
ROBERT SPENCER
Counsel for Plaintiff
Andrea Prior

PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On July 19, 2024, in the case of *Andrea Prior v. Adventist Health Clearlake Hospital, Inc.*, Lake County Superior Court Case Number CV 423216, I served the foregoing document(s):

NOTICE OF MOTION AND MOTION FOR AN ORDER APPROVING SETTLEMENT OF PAGA ACTION AND DISMISSING ACTION WITH PREJUDICE

on the interested party(ies) below, using the following means:

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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



JOEY GONZALEZ