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Attorneys for Plaintiff ANGEL PEREZ
On behalf of herself and all others similarly situated

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

ANGEL PEREZ, on behalf of herself and all
others similarly situated,

Plaintiff,

vs.

HILTON MANOR, LLC; BLUE JAY
MANOR, LLC; JUNIPER MANOR, LLC;
BRIGHT SKY HOME HEALTH CARE,
INC.; BRIGHT SKY HOSPICE CARE INC.;
ELEANOR ISWINARI POSNER; and DOES
3-50, inclusive,

Defendants.

) Case No. CIVSB2220728

) **PLAINTIFF'S NOTICE OF MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND AWARD
FOR ATTORNEYS' FEES, COSTS, AND
CLASS REPRESENTATIVE
ENHANCEMENT**

) Date: March 12, 2025

) Time 8:30 a.m.

) Judge: Hon. Christian Towns

) Dept: S-26

) Action Filed: September 16, 2022

) Trial Date: None

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1 **TO THE CLERK OF COURT AND ALL INTERESTED PARTIES:**

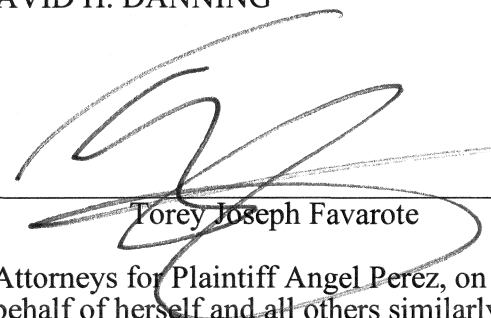
2 PLEASE TAKE NOTICE that on March 12, 2025, at 8:30 a.m. or as soon thereafter as
3 counsel may be heard, in Department S-26 of this Court, located at 247 W. 3rd St., San Bernardino,
4 CA 92415-0210, before the Honorable Christian Towns, plaintiff Angel Perez ("Plaintiff") will and
5 does hereby move the Court for an order granting final approval of the class action settlement (the
6 "Settlement"), an award of a class representative enhancement for Plaintiff, and an award of
7 reasonable attorneys' fees and costs for Class Counsel.

8 The motion is made on the grounds that the Settlement, which was reached after arms'
9 length negotiations by counsel for the parties, is fair and reasonable, has drawn a favorable
10 response from the Class with no objections and no opt-outs, and should be given final approval by
11 the Court for all the reasons set forth in the accompanying memorandum in support of the motion.

12 This motion is based on this notice, the accompanying memorandum in support of the
13 motion, the declaration of Nicole Bench for ILYM Group, Inc. in support of the motion; the
14 declaration Torey Joseph Favarote in support of the motion; the declaration of class representative
15 Angel Perez; Plaintiff's Motion for Final Approval of Class Action Settlement; and all matters of
16 which the Court may take notice, and any oral or documentary evidence presented at the hearing on
17 the motion.

18 Dated: February 14, 2025

19 GLEASON & FAVAROTE LLP
20 TOREY JOSEPH FAVAROTE
21 DAVID H. DANNING

22 By: 

23 Torey Joseph Favarote

24 Attorneys for Plaintiff Angel Perez, on
25 behalf of herself and all others similarly
26 situated
27
28

PROOF OF SERVICE

I, Thomas Steinhart, declare:

I am and was at the time of the service mentioned in this declaration, employed in the County of Los Angeles, California. I am over the age of 18 years and not a party to the within action. My business address is Gleason & Favarote, LLP, 3646 Long Beach Blvd., Suite 203, Long Beach, CA 90807.

On February 14, 2025, I served a copy(ies) of the following document(s):

**PLAINTIFF'S NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND AWARD FOR ATTORNEYS' FEES, COSTS, AND CLASS
REPRESENTATIVE ENHANCEMENT**

on the parties to this action as follows:

Attorney	Party(ies) Served	Method of Service
Erick J. Becker, P.C. Garrett Fahy Hwui Lee CUMMINS & WHITE, LLP 2424 S.E. Bristol St., Ste. 300 Newport Beach, CA 92660 Tel: (949) 852-1800 Fax: (949) 852-8510 ebecker@cwlawyers.com gfahy@cwlawyers.com hlee@cwlawyers.com dpimentel@cwlawyers.com dgabrielson@cwlawyers.com	Attorney for Defendants HILTON MANOR, LLC; BLUE JAY MANOR, LLC; JUNIPER MANOR, LLC; BRIGHT SKY HOME HEALTH CARE, INC.; BRIGHT SKY HOSPICE CARE INC.; and ELEANOR ISWINARI POSNER	Email

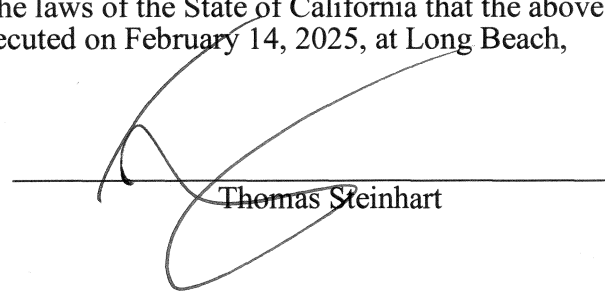
☐ [BY OVERNIGHT COURIER] I caused the sealed envelope(s) to be delivered by a commercial courier service for overnight delivery to the offices of the addressee(s).

☐ [BY HAND] I directed the sealed envelope(s) to the party(ies) so designated on the service list to be delivered by Blue Moon Legal this date.

☐ [BY FACSIMILE TRANSMISSION] I caused said document to be sent by facsimile transmission to the fax number indicated for the party(ies) listed above.

☒ [BY ELECTRONIC TRANSMISSION] I caused said document to be sent by electronic transmission to the e-mail address indicated for the party(ies) listed above.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that this declaration was executed on February 14, 2025, at Long Beach, California.


Thomas Steinhart