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10 Attorney for Plaintiff Kaitlin Talley, on
11 behalf of herself and all others similarly
situated and the general public

12
13 SUPERIOR COURT OF CALIFORNIA

14 COUNTY OF SANTA CLARA

15 KAITLIN TALLEY, on behalf of herself and	) Case No. 22CV403416
16 all others similarly situated and the general	) Honorable Charles F. Adams
public,	) Dept. 7
17	)
Plaintiff,	) NOTICE OF PLAINTIFF'S MOTION
18	) FOR COURT APPROVAL OF PAGA
v.	) SETTLEMENT
19	)
20 TRAVEL NURSE ACROSS AMERICA, LLC	) Date: May 8, 2025
an Arkansas limited liability company; and	) Time: 1:30 p.m.
21 DOES 1 to 100,	) Dept.:7
	)
22 Defendants.	) Action filed: September 22, 2022
	)

1 PLEASE TAKE NOTICE that on May 8, 2025, at 1:30 p.m., or as soon thereafter as the
2 matter may be heard before the Honorable Charles F. Adams of the Superior Court of the State of
3 California, County of Santa Clara located at 191 North First Street San Jose, California 95113,
4 Plaintiff Kaitlin Talley (“Plaintiff”) will and hereby does move for entry of an order and judgment
5 as follows:

6 1. Granting approval, pursuant to California *Labor Code* § 2699, subd. (1)(2) of the
7 proposed settlement between Plaintiff and Defendant Travel Nurse Across America, LLC
8 (“Defendant”) of the claims brought pursuant to the Private Attorneys General Act of 2004
9 (“PAGA”) as set forth in the PAGA Settlement Agreement (“Settlement Agreement”), attached as
10 **Exhibit 1** to the Declaration of Janelle Carney;

11 2. Approving the Net Distribution Amount payable to the State of California and
12 Aggrieved Employees as authorized by California *Labor Code* § 2699(i);

13 3. Appointing Rust Consulting, Inc. (“Rust”) as the Settlement Administrator;

14 4. Directing Defendant to transmit settlement funds to the Settlement Administrator in
15 the total amount of \$850,000.00 as set forth in the Settlement Agreement;

16 5. Directing the Settlement Administrator to distribute the settlement funds to the
17 Aggrieved Employees, and distributing funds to the Labor and Workforce Development Agency
18 (“LWDA”), Plaintiff’s Counsel, and for Settlement Administration Costs, in accordance with the
19 terms of the Settlement Agreement;

20 6. Awarding to Plaintiff’s Counsel the amount of \$297,500.00 as compensation for
21 reasonable attorneys’ fees (“Attorneys’ Fees Payment”), up to \$15,000.00 for reimbursement of
22 litigation costs and expenses (“Litigation Costs Payment”), and up to \$7,987.00, for Settlement
23 Administration Costs.

24 This motion is based on this Notice of Motion and Motion, the Memorandum of Points and
25 Authorities, the Settlement Agreement, the Declarations of Janelle Carney, Adam Rose, and Kaitlin
26 Talley, the pleadings and other records on file with the Court in this matter, and such evidence and
27 oral argument as may be presented at the hearing on this Motion.

1 Dated: December 23, 2024

JANELLE CARNEY – ATTORNEY AT LAW, APC
FRONTIER LAW CENTER

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3
4 By:


Janelle Carney,
Attorney for Plaintiff Kaitlin Talley