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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

JENNIFER WONG, an individual, on
behalf of herself, and on behalf of all
persons similarly situated,

Plaintiff,

vs.

NURSE LOGISTICS, INC., a California
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 22CV408939

**NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

Hearing Date: August 21, 2024
Hearing Time: 1:30 p.m.

Judge: Hon. Theodore C. Zayner
Dept: 19

Date Filed: June 24, 2022
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on August 21, 2024 at 1:30 p.m., in
Department 19 of the above entitled Court before the Honorable Theodore C. Zayner,
Plaintiff Jennifer Wong ("Plaintiff") will move for an order: (1) preliminarily approving the

1 proposed settlement of this class action with Defendant Nurse Logistics, Inc. (“Defendant”);
2 (2) for settlement purposes only, conditionally certifying the Class, which is comprised of
3 “all individuals who currently work or previously worked as a nurse and an independent
4 contractor in the State of California and who were paid by Defendant or its affiliate Nurse
5 Registry, Inc. at any time during the Class Period”, which is December 16, 2018 through
6 October 5, 2023; (3) provisionally appointing Plaintiff as the representative of the Class; (4)
7 provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik,
8 Nicholas J. De Blouw, Jeffrey S. Herman, Sergio J. Puche, and Trevor G. Moran of
9 Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the Class; (5)
10 approving the form and method for providing notice to the Class of the proposed settlement;
11 (6) directing that notice of the proposed settlement be given to the Class; (7) appointing
12 Apex Class Action as the Administrator; and (8) scheduling a final approval hearing date for
13 January 8, 2025 to consider the Plaintiff’s motion for final approval of the settlement and for
14 approval of attorneys’ fees, expenses and the service award.

15 This motion for preliminary approval of the class settlement is brought pursuant to
16 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of
17 motion and motion, the accompanying memorandum of points and authorities, the
18 Declaration of Kyle Nordrehaug, the Declaration of Plaintiff Jennifer Wong, the Class
19 Action and PAGA Settlement Agreement (the “Agreement”) between the parties, and the
20 complete files and records in this action. Because all Parties have agreed to the proposed
21 class settlement, this motion is unopposed.

22 Respectfully submitted,

23 Dated: July 26, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

24 By: /s/ Kyle Nordrehaug
25 Kyle R. Nordrehaug, Esq.
26 Attorney for Plaintiff
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