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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF STANISLAUS**

TYEISHA TRAVIS, ALEJANDRA
NAVA, an individual, on behalf of
themselves, and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

COMMUNITY HOSPICE, INC., a
California Corporation; and Does 1
through 50, Inclusive,

Defendants.

CASE NO.: **CV-23-001773**

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

Hearing Date: January 13, 2026
Hearing Time: 8:30 a.m.

Judge: Hon. John D. Freeland
Dept: 23

Date Filed: April 4, 2023
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on January 13, 2026 in
Department 23, at the above entitled Court before the Honorable John D. Freeland, Plaintiffs

1 Tyeisha Travis and Alejandra Nava (“Plaintiffs”) will apply for an order: (1) preliminarily
2 approving the proposed class action and PAGA settlement with Defendant Community
3 Hospice, Inc. (“Defendant”); (2) for settlement purposes only, conditionally certifying the
4 Class, which is comprised of “all individuals who are or previously were employed by
5 Defendant in California and classified as a non-exempt employee at any time during the
6 Class Period”, which is April 4, 2019 through June 8, 2025; (3) provisionally appointing
7 Plaintiffs as the representatives of the Class; (4) provisionally appointing Blumenthal
8 Nordrehaug Bhowmik De Blouw LLP as Class Counsel; (5) approving the form and method
9 for providing class-wide notice; (6) directing that notice of the proposed settlement be given
10 to the Class; (7) appointing Apex Class Action LLC as Administrator, and (8) scheduling a
11 final approval hearing date, proposed for June 9, 2026, to consider Plaintiffs’ motion for
12 final approval of the settlement and for approval of attorneys’ fees, expenses and the service
13 awards.

14 This unopposed motion for preliminary approval of the class settlement is brought
15 pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this
16 notice of motion and motion, the accompanying memorandum of points and authorities, the
17 Declaration of Kyle Nordrehaug, the Declarations of the Plaintiffs, the Class Action and
18 PAGA Settlement Agreement (“Agreement”) between the Parties, and the complete files and
19 records in this action. Because all Parties have agreed to the proposed class settlement, this
20 motion is not opposed by Defendant.

21 Respectfully submitted,

22 Dated: December 18, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

23 By: /s/ Kyle Nordrehaug
24 Kyle R. Nordrehaug, Esq.
25 Attorney for Plaintiffs
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