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Attorneys for Plaintiff
Leticia Bonnet

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF VENTURA

LETICIA BONNET, as an individual and on
behalf of others similarly situated,

Plaintiff,

v.

VITAL PLUS HOME HEALTH CARE, a
California Corporation and dba Access TLC
Home Health Care,
and
DOES 1-10, Inclusive,

Defendants.

Case Number: 2025CUOE046790

*Assigned for all purposes to Hon. Charmaine H.
Buehner*

CLASS ACTION/PAGA ACTION

**NOTICE OF MOTION AND PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT AND
APPROVAL OF PAGA SETTLEMENT**

Hearing:

Date: July 29, 2026

Time: 1:30 p.m.

Location: Dept.: 44

Action Filed: July 3, 2025

FAC Filed: September 9, 2025

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1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEY OF RECORD:

2 PLEASE TAKE NOTICE THAT on **July 29, 2026 at 1:30 p.m.** or as soon thereafter as the matter
3 can be heard before the Honorable Charmaine H. Buehner, in Department 44 of the Ventura County
4 Superior Court, located at The Hall of Justice, 800 S. Victoria Avenue, Ventura, CA, 93009, plaintiff
5 Leticia Bonnet (“Plaintiff”) will, and hereby does, move the Court to grant preliminary approval of the
6 parties’ proposed class action settlement and approval of the parties’ PAGA settlement. **This Motion is**
7 **unopposed by Defendants.** Specifically, Plaintiff requests that the Court issue an order:

- 8 (i) granting preliminary approval of the proposed class settlement and granting approval of
9 the PAGA settlement codified in the Joint Stipulation of Class Action and PAGA
10 Settlement (“Settlement Agreement” or “Settlement”);
- 11 (ii) conditionally granting class certification of the Class, solely for settlement purposes,
12 pursuant to California Code of Civil Procedure §382;
- 13 (iii) appointing Diane E. Richard of Richard Law, P.C. as Class Counsel for the proposed Class
14 solely for settlement purposes;
- 15 (iv) appointing Plaintiff Leticia Bonnet as the Class Representative of the proposed Class solely
16 for settlement purposes;
- 17 (v) approving ILYM Group, Inc. as the Settlement Administrator;
- 18 (vi) approving the use of the proposed notice procedures and the manner and method for Class
19 Members to object or request exclusion from the Class Settlement;
- 20 (vii) authorizing the form, content and distribution and mailing of the proposed Class Notice;
21 and
- 22 (viii) scheduling a "fairness hearing"/Final Approval Hearing.

23 The “Class” means, for purposes of settlement only, all current and former non-exempt employees of Vital
24 Plus Home Health Care in the state of California who have worked in whole or in part in the field and/or
25 have been paid in whole or in part a piece-rate at any time during the Class Period of July 3, 2021 until
26 May 15, 2026.

27 Plaintiff makes this Motion on the following grounds: (i) the PAGA settlement should be approved
28 under the PAGA (California Labor Code §2698 *et seq.*); (ii) the Class meets all the requirements for class

1 certification for settlement purposes only under California Code of Civil Procedure §382; (iii) Plaintiff
2 and her counsel are adequate to represent the Class; (iv) the Settlement reflects a fair, adequate, and
3 reasonable compromise of disputed claims and is well within the range of possible final approval in view
4 of Defendant's potential liability and financial exposure as compared against the risk of continued
5 litigation; (v) the proposed notice procedures and notice form adequately apprise the member of the Class
6 of their rights under the Settlement including their right to participate in, opt-out of, or object to the Class
7 Settlement, and fully comport with due process; and (vi) in light of the foregoing, the Class Notice should
8 be disseminated to members of the Class and a hearing date for motion for final approval of the Class
9 Settlement should be set.

10 This motion is based upon this Notice of Motion and Motion, the accompanying Memorandum of
11 Points and Authorities and declarations in support of the motion, and attached exhibits, such evidence and
12 argument of counsel as may be presented at the hearing, the complete files and records in the above-
13 captioned matter, and such additional matters as the Court may consider.

14 Respectfully submitted,

15 RICHARD LAW, P.C.

16 July 2, 2026

17 By: Diane Richard
18 DIANE E. RICHARD
19 Attorney for Plaintiff
20 Leticia Bonnet
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PROOF OF SERVICE

Leticia Bonnet v Vital Plus Home Health Care. et al (Case Number: 2025CUOE046790)

1. At the time of service, I was a United States citizen, a resident of the County of San Diego, over 18 years of age, and not a party to or interest in this action.

2. My business address is 5060 N. Harbor Drive, Suite 265, San Diego, CA 92106.

3. On **July 2, 2026**, I served the following document(s), including all exhibits thereto:

• **NOTICE OF MOTION AND PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PAGA SETTLEMENT**

4. I served the document(s) on the following:

- LightGabler LLP
Michael H. Brody - mbrody@lightgablerlaw.com
Ryan C. Ely - rely@lightgablerlaw.com
760 Paseo Camarillo, Suite 300
Camarillo, CA 93010
Telephone: (805) 248-7208; Facsimile: (805) 248-7209

- LWDA – Via Online Submission - <https://dir.govfa.net/432>

5. The document(s) were served by the following means:

☒ **BY ELECTRONIC SERVICE** –Based on a court order, court rule, or an agreement of the parties to accept electronic service, I caused such document(s) to be delivered to the person(s) at the electronic service address set forth above. Said document(s) was/were served electronically and the transmission was reported as complete and without error.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on **July 2, 2026**, at San Diego, California.

Diane Richard

Name

/s/ Diane Richard

Signature