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Attorneys for Plaintiffs
INGRID RAGOOBAR, AMBER UGARTE,
AND MARKI HENDERSON

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA**

INGRID RAGOOBAR, et al.

Plaintiffs,

vs.

SUTTER HEALTH,

Defendant.

Case No.: 23CV037410

Assigned for All Purposes to:
Hon. Joscelyn Jones, Dept. 19

**NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT AGREEMENT AND
RELEASE**

Reservation ID: 591274507438

Date: June 29, 2026
Time: 3:00 p.m.
Room: Dept. 19

Complaint Filed: June 30, 2023
Trial Date: December 4, 2026

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on June 29, 2026 at 3:00 p.m. in Department 19 of the Superior
Court of California, County of Alameda, located at 1221 Oak St., Oakland, CA 94612,

1 before the Honorable Joscelyn Jones, or as soon thereafter as this matter can be heard, Plaintiffs
2 Ingrid Ragoobar, Amber Ugarte, and Marki Henderson (“Plaintiffs”) will and hereby do
3 respectfully move this Court for an order:

4 1. Granting preliminary approval of the Joint Stipulation of Class Action and PAGA
5 Settlement and Release (“Settlement Agreement”) between Plaintiffs and Defendant Sutter Health
6 (“Defendant”) (collectively the “Parties”), attached as Exhibit A to the Declaration of Carol A. Igoe.

7 2. Pursuant to California Code of Civil Procedure section 382, conditionally certifying,
8 for settlement purposes only, the Settlement Class as defined in the Settlement Agreement;

9 3. Approving Carol A. Igoe of Carol Igoe Law, APC, Nicole J. Daro, and Imhotep A.
10 Royster of the California Nurses Association as Class Counsel;

11 4. Approving Plaintiffs Ingrid Ragoobar, Amber Ugarte, and Marki Henderson as the
12 Class Representatives;

13 5. Finding that the Parties' Court-Approved Notice of Pendency of Class Action and
14 PAGA Settlement and Final Hearing (“Class Notice”), attached as Exhibit 1 to the Settlement
15 Agreement, is the best means practicable of providing notice under the circumstances, and when
16 completed according to the terms of the Settlement Agreement, shall constitute due and sufficient
17 notice of this Action, the Settlement, and the Final Approval Hearing to all persons affected by, or
18 authorized to participate in, the Settlement Agreement in full compliance with California Rule of
19 Court 3.769, California Code of Civil Procedure section 382, and the requirement of due process;

20 6. Approving the form and content of the proposed Class Notice, and establishing a
21 schedule for the dissemination of the Class Notice as well as the deadlines for Settlement Class
22 Members to object to or opt out in connection with the Settlement;

23 7. Approving Phoenix Settlement Administrators as the Settlement Administrator;

24 8. Granting, substantially, the Proposed Preliminary Approval Order submitted
25 herewith;

26 9. Scheduling a hearing on final approval of the Settlement at which Class Members
27 may be heard, to determine all necessary matters concerning the Settlement, including whether:

28 a. the Settlement is fair, adequate, and reasonable,

- 1 b. Court should grant final approval,
2 c. to grant Class Counsel's application for an award of fees and costs, and
3 d. to grant Plaintiffs' application for Class Representative Service Awards.

4 10. This motion is brought pursuant to California Rule of Court 3.769 and California
5 Code of Civil Procedure section 382, and is based on this Notice of Motion and Motion; the
6 Memorandum of Points and Authorities; the Declaration of Class Counsel; the Declarations of
7 Plaintiffs; all documents currently on file in this action; the arguments of counsel; and such other
8 and further evidence as the Court may choose to entertain.

9 Dated: March 13, 2026

Respectfully submitted,

CAROL IGOE LAW, APC

/s/ Carol A. Igoe

Carol A. Igoe

Attorneys for Plaintiffs

INGRID RAGOOBAR,

AMBER UGARTE, AND

MARKI HENDERSON

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correct copy of the following document:

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
AND PAGA SETTLEMENT AGREEMENT; CONDITIONAL CERTIFICATION OF
THE SETTLEMENT CLASS; APPROVAL OF CLASS NOTICE; AND
APPOINTMENT OF SETTLEMENT ADMINISTRATOR**

via electronic mail on the parties listed below:

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Attorneys for Defendant
Sutter Health

is true and correct. Executed on April 2, 2026 at Monona, Dane County, Wisconsin.

Kristen L. Comstock



Superior Court of Alameda County Public Portal

Make a Reservation

RAGOOBAR, et al. vs SUTTER HEALTH

Case Number: 23CV037410 Case Type: Civil Unlimited Category: Other Employment Complaint Case
Date Filed: 2023-06-30 Location: Rene C. Davidson Courthouse - Department 19

Reservation

Case Name: RAGOOBAR, et al. vs SUTTER HEALTH	Case Number: 23CV037410
Type: Motion to Confirm Settlement	Status: RESERVED
Filing Party: Ingrid Ragoobar (Plaintiff)	Location: Rene C. Davidson Courthouse - Department 19
Date/Time: 06/29/2026 3:00 PM	Number of Motions: 1
Reservation ID: 591274507438	Confirmation Code: CR-MOMYVLQ9DV8GLVZXD

Fees

Description	Fee	Qty	Amount
Motion to Confirm Settlement	0.00	1	0.00
Court Technology Fee	1.00	1	1.00
TOTAL			\$1.00

Payment

Amount: \$1.00	Type: MasterCard
Account Number: XXXX8963	Authorization: 67310P
Payment Date: n/a	

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