

**BLUMENTHAL NORDREHAUG BHOWMIK
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ORANGE**

AMY GORDON, an individual, on behalf
of herself and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

SUMMIT MEDICAL STAFFING LLC, a
Limited Liability Company; and DOES 1
through 50, inclusive,

Defendants.

CASE NO.: 30-2025-01468470-CU-OE-CXC

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

Hearing Date: December 12, 2025
Hearing Time: 9:00 a.m.
Reservation No. 74703424

Judge: Hon. William Claster
Dept.: CX101

Action Filed: April 17, 2023
Trial Date: Not Set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on December 12, 2025, or as soon thereafter as the matter can be heard, in Department CX101 at the above entitled Court before the Honorable William Claster, Plaintiff Amy Gordon ("Plaintiff") will apply for an

1 order: (1) preliminarily approving the proposed settlement of this class and PAGA action
2 with Defendant Summit Medical Staffing LLC (“Defendant”); (2) for settlement purposes
3 only, conditionally certifying the Class, defined as: “all individuals who were employed by
4 Defendant Summit Medical Staffing, LLC who were classified as non-exempt in the State of
5 California at any time during the Class Period,” which is April 17, 2019 through December 30,
6 2024; (3) provisionally appointing Plaintiff as the representative of the Class; (4)
7 provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class
8 Counsel; (5) approving the form and method for providing class-wide notice; (6) directing
9 that notice of the proposed settlement be given to the class; (7) appointing Apex Class
10 Action LLC as the Administrator; and (8) scheduling a final approval hearing date for May
11 15, 2026 to consider Plaintiff’s motion for final approval of the settlement and for approval
12 of attorneys’ fees and expenses.

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

20 Respectfully submitted,

21 Dated: November 13, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

22 By: /s/ Kyle Nordrehaug
23 Kyle R. Nordrehaug, Esq.
24 Attorney for Plaintiff
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