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Attorneys for Plaintiff Stacey L. Grimson,
on behalf of herself and all others similarly situated

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SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN JOAQUIN

STACEY L. GRIMSON, on behalf of herself and all others similarly situated, Plaintiff, v. PROVIDENT CARE INC., a California Corporation; and DOES 1-10, inclusive, Defendant.	Case No. STK-CV-UOE-2025-0014893 ASSIGNED FOR ALL PURPOSES TO: The Honorable Blanca Bañuelos Department 10B **CLASS AND REPRESENTATIVE ACTION** **NOTICE OF MOTION AND PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT** Date: TBD Time: 9:00 a.m. Dept.: 10B Complaint filed: October 10, 2025 Trial date: Not Set

PLEASE TAKE NOTICE, on _____, at 9:00 a.m., or as soon as the matter may be heard in Department 10B of the above-captioned court, located at 180 East Weber Avenue, Stockton, California 95202, the Honorable e Blanca Bañuelos presiding, Plaintiff Stacey L. Grimson ("Plaintiff"), on behalf of herself and others similarly situated and aggrieved, will move this Court for an Order:

1. Preliminarily approving the Class and Representative Action Settlement as fair, adequate, and reasonable based upon the terms set forth in the Class Action and PAGA Settlement Agreement ("Agreement"), including payment by Defendant Provident Care, Inc. ("Defendant") of the Gross Settlement Amount of $150,000.00;

2. Conditionally certifying the case as a class action for settlement purposes only;

3. Approving the Court Approved Notice of Class Action Settlement ("Class Notice") to be mailed to all Class Members advising them of the pendency of Class Action, proposed Settlement, manner and procedure to submit requests for exclusion and objections to the Settlement, automatic payment of their share of the Net Settlement Amount without the need to return a claim form, date set for the Final Approval hearing, and of the right to appear at the Hearing;

4. Appointing The Markham Law Firm, Cohelan Khoury & Singer, and United Employees Law Group.as Class Counsel;

5. Appointing Plaintiff Stacey L. Grimson as Class Representative;

6. Appointing ILYM Group, Inc. as the Settlement Administrator; and

7. Setting a hearing date to consider final approval of the Settlement.

This motion is made based on this Notice; Points and Authorities; Declarations of Class Counsel, Isam C. Khoury, David R. Markham, and Walter L. Haines; Declaration of Class Representative Stacey L. Grimson; Declaration of Lisa Mullins on behalf of ILYM Group, Inc.; the Agreement; [Proposed] Order Granting Motion for Preliminary Approval of Class and

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Representative Action Settlement; the Court's files; and such other evidence the Court may consider.

Respectfully submitted,

THE MARKHAM LAW FIRM
UNITED EMPLOYEES LAW GROUP, P.C.
COHELAN KHOURY & SINGER

Dated: October 15, 2026

By:_____

Isam C. Khoury
Maggie K. Realin
Attorneys for Plaintiff Stacey Grimson, on behalf of herself and all others similarly situated

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