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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

LILIANA GODINA, LISA HOWELL,
and BERT MERCADO, individually, and
on behalf of all persons similarly situated,

Plaintiff,

vs.

KAISER FOUNDATION HOSPITALS, a
California non-profit corporation, and
DOES 1 through 50, inclusive,

Defendants.

Case No. 23STCV25366

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

Hearing Date: May 5, 2025

Hearing Time: 9:30 a.m.

Judge: Hon. David S. Cunningham III
Dept: SS-11

Date Filed: October 17, 2023

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on May 5, 2025 at 9:20 a.m., in Department
11 in the Spring Street Courthouse of the above entitled Court before the Honorable David

1 S. Cunningham III, Plaintiffs Lisa Howell, Bert Mercado, and Liliana Godina (“Plaintiffs”)
2 will move for an order: (1) preliminarily approving the proposed settlement of this class
3 action with Defendant Kaiser Foundation Hospitals (“Defendant”); (2) for settlement
4 purposes only, conditionally certifying the Class, which is comprised of “all non-exempt
5 persons who were employed by Defendant in the State of California at any time during the
6 Class Period”, which is January 1, 2024 through December 31, 2024; (3) provisionally
7 appointing Plaintiffs as the representatives of the Class; (4) provisionally appointing
8 Blumenthal Nordrehaug Bhowmik De Blouw LLP and Haig B. Kazandjian Lawyers APC as
9 Class Counsel for the Class; (5) approving the form and method for providing notice to the
10 Class of the proposed settlement; (6) directing that notice of the proposed settlement be
11 given to the Class; (7) appointing ILYM Group, Inc. as the Administrator; and
12 (8) scheduling a final approval hearing date in approximately five months to consider the
13 Plaintiffs’ motion for final approval of the settlement and for approval of attorneys’ fees,
14 expenses and the service awards.

15 This motion for preliminary approval of the class settlement is brought pursuant to
16 California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this notice of
17 motion and motion, the accompanying memorandum of points and authorities, the
18 Declaration of Kyle Nordrehaug, the Declaration of Haig B. Kazandjian, the Declarations of
19 the Plaintiffs, the Class and Representative Action Settlement Agreement (the “Agreement”)
20 between the Parties, and the complete files and records in this action. Because all Parties
21 have agreed to the proposed class settlement, this motion is unopposed.

22 Respectfully submitted,

23 Dated: January 31, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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