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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MONO**

ROSALBA DIAZ-SANDOVAL, individually,
and on behalf of other members of the general
public similarly situated;

Plaintiff,

v.

SOUTHERN MONO HEALTHCARE
DISTRICT, a California corporation; and
DOES 1 through 100, inclusive;

Defendants.

Case No.: 22UCM45

Assigned for All Purposes to:
Honorable Mark Magit
Courtroom 2

CLASS ACTION

**SUPPLEMENTAL BRIEF IN SUPPORT
OF PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Supplemental Declaration of Proposed
Class Counsel (Douglas Han); and Amended
[Proposed] Order filed concurrently
herewith]

Hearing Date: November 7, 2024
Hearing Time: 9:30 a.m.
Hearing Place: Courtroom 2

Complaint Filed: May 6, 2022
FAC Filed: July 14, 2022
SAC Filed: February 13, 2024
Trial Date: None Set

Plaintiffs Rosalba Diaz-Sandoval and Steven Conde (“Plaintiffs”) provide this supplemental submission in response to the Court’s ruling on the Motion for Preliminary Approval of Class Action Settlement originally scheduled for hearing on August 1, 2024 at 9:30 a.m. At the Preliminary Approval Hearing on August 1, 2024 at 9:30 a.m., the Court instructed the Parties to make certain adjustments to the settlement documents. The Court also continued the Preliminary Approval Hearing to November 7, 2024 at 9:30 a.m.

The chart below lists each of the Court’s issues and the revisions/submissions made to address each issue.

Ruling	Revisions/Submissions
(1) Released Claims.	The Settlement Agreement has been amended accordingly. (Supplemental Declaration of Douglas Han in Support of Motion for Preliminary Approval of Class Action Settlement (“Supp. Han Decl.”), ¶ 3; Exhibit 1, ¶ 43.)
(2) Courtroom Location.	The Settlement Agreement has been amended accordingly. (Supp Han Decl., <i>supra</i>, at ¶ 4; Exhibit 1, p. 1.) The Class Notice was modified accordingly. (Supp Han Decl., <i>supra</i>, at ¶ 5; Exhibit 3, p. 1.)

(3) Contacting the Claims Administrator to Receive Copies of the Operative Complaint and Settlement Agreement.

The Class Notice was modified accordingly.

(Supp Han Decl., *supra*, at ¶ 6; Exhibit 3, p. 2.)

(4) Typographical Error in the Class Notice.

The Class Notice was modified accordingly.

(Supp Han Decl., *supra*, at ¶ 7; Exhibit 3, p. 5.)

(5) Serving Objections to Counsel for Defendant Only.

The Settlement Agreement has been amended accordingly.

(Supp Han Decl., *supra*, at ¶ 8; Exhibit 1, ¶ 74.)

The Class Notice was modified accordingly.

(Supp Han Decl., *supra*, at ¶ 9; Exhibit 3, p. 4.)

Dated: September 20, 2024

JUSTICE LAW CORPORATION

By: 

Douglas Han
Attorney for Plaintiffs

**PROOF OF SERVICE
1013A(3) CCP**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 751 N. Fair Oaks Ave., Ste. 101 Pasadena, California 91103. My electronic service address is bitty@justicelawcorp.com

On September 20, 2024, I served the foregoing document described as

SUPPLEMENTAL BRIEF IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

for the following case: **Diaz-Sandoval v. Southern Mono Healthcare District**
LWDA/Court Case No.: **LWDA-CM-960229-23**
22UCM45
Mono County Superior Court

on interested parties in this action by electronically submitting as follows:

State of California
Labor & Workforce Development Agency
800 Capitol Mall, MIC-55
Sacramento, California 95814

[X] BY ELECTRONIC SUBMISSION

Pursuant to California Senate Bill No. 836, I caused the documents described above to be electronically submitted by and through the procedure stated on the website of the State of California Labor and Workforce Development Agency.

[X] STATE

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 20, 2024, at Pasadena, California.


Bitty Minnis-Lemley