

Eve H. Cervantez (State Bar No. 164709)
Robin Tholin (State Bar No. 344845)
ALTSHULER BERZON LLP
177 Post Street, Suite 300
San Francisco, CA 94108
Telephone: (415) 421-7151
ecervantez@altber.com
rtholin@altber.com

K. Ross Merrill (pro hac vice pending)
STUEVE SIEGEL HANSON LLP
460 Nichols Road, Suite 200
Kansas City, Missouri 64112
Telephone: 816-714-7100
merrill@stuevesiegel.com

*Attorneys for Plaintiffs Jessica Plummer,
Paige Rieboldt, and Danielle Devenney*

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ALAMEDA

JESSICA PLUMMER, PAIGE RIEBOLDT,
and DANIELLE DEVENNEY individually
and on behalf of all other similarly situated
aggrieved employees,

Plaintiffs,

vs.

FLEXCARE, LLC and DOES 1-50,
inclusive,

Defendants

CASE NO.: 23CV050251

[Assigned for all purposes to Judge Julia Spain,
Department 520]

**PLAINTIFFS' NOTICE OF UNOPPOSED
MOTION AND UNOPPOSED MOTION FOR
APPROVAL OF PAGA SETTLEMENT,
ATTORNEYS' FEES AND COSTS, AND
SERVICE AWARDS**

Hearing Date: April 17, 2024

Time: 2:00 p.m.

Dept.: 520

Reservation No.: A-502151-001

Complaint Filed: November 6, 2023

Trial Date: Not Set

[Filed concurrently with Memorandum of Points
and Authorities; Declaration of Eve H. Cervantez
and Accompanying Exhibits; Declaration of K.
Ross Merrill and Accompanying Exhibits; and
Proposed Order]

1 **NOTICE OF MOTION AND MOTION**

2 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:** You are hereby notified
3 that on April 17, 2024 at 2:00 p.m. in Department 520 of this Court, located at 24405 Amador
4 Street, Hayward, CA 94544, Plaintiffs will move the Court, pursuant to Labor Code §2699(1)(2), for
5 approval of the parties' proposed settlement of the Private Attorney General Act claim asserted in
6 Plaintiffs' First Amended Complaint under Labor Code §2698 *et seq.*, filed concurrently with this
7 motion, and for approval of an award of attorneys' fees and litigation costs and service awards to the
8 named plaintiffs. The motion will be based on this Notice of Unopposed Motion and Unopposed
9 Motion; the supporting Memorandum of Points and Authorities; and the supporting Declarations of
10 Eve H. Cervantez and K. Ross Merrill and accompanying exhibits. Defendants do not oppose this
11 motion.

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13 Dated: March 26, 2024

/s/ Eve H. Cervantez
Eve H. Cervantez (SBN 164709)
Robin Tholin (State Bar No. 344845)
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rtholin@altber.com

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STUEVE SIEGEL HANSON LLP
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merrill@stuevesiegel.com

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23 *Attorneys for Plaintiffs*
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