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Attorneys for PLAINTIFF

(Additional Counsel listed on next page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

EDYTHE GUZMAN, individually, and on
behalf of other members of the general public
similarly situated and on behalf of other
aggrieved employees pursuant to the California
Private Attorneys General Act,

Plaintiff,

v.

AMERICAN ALL CARE SERVICES
HOSPICE, INC., a California Corporation; and
DOES 1 through 100, Inclusive,

Defendants.

Case No.: 24STCV00055

**NOTICE OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: February 17, 2026

Time: 10:30 a.m.

Judge: Hon. Theresa M. Traber

Dept.: 1

1 **LAWYERS *for* JUSTICE, P.C.**

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6 Attorneys for PLAINTIFF

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1 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on February 17, 2026, or as soon
3 thereafter as the matter can be heard, in Department 1 of the above-entitled Court, before the
4 Honorable Judge Theresa M. Traber, Plaintiff EDYTHE GUZMAN (“Plaintiff”) will apply for an
5 order will apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement,
6 and (2) Entry of the Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated September
8 5, 2025, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Class Action and PAGA Settlement Agreement
10 (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-
11 Claude Lapuyade, Esq., the Declaration of the Settlement Administrator, the Declaration of Maria
12 Halwadjian, Esq., the Declaration of Edythe Guzman, and the complete files and records in this
13 action.

14 Because all parties have agreed to the proposed class settlement and have met and conferred
15 regarding the motion, this motion is not opposed by Defendant. To date, there have been no
16 objections submitted by the Class.

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18 Dated: January 20, 2026

ZAKAY LAW GROUP, APLC

19 By: Nicole Noursamadi
20 Nicole Noursamadi, Esq.
21 Attorneys for PLAINTIFF
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