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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN MATEO

AMANDA NUNEZ and MARLISHA L.
JAMES, individuals, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

UNIVERSITY HEALTHCARE
ALLIANCE, a Corporation; and DOES 1
through 50, inclusive,

Defendants.

CASE NO.: **23-CIV-05931**

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

Hearing Date: January 27, 2026

Hearing Time: 2:00 p.m.

Judge: Hon. Nancy L. Fineman

Dept: 4

Courtroom: 4C

Date Filed: December 14, 2023

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 2:00 p.m. on January 27, 2026 in
Department 4, Courtroom 4C, at the above entitled Court before the Honorable Nancy L.
Fineman, Plaintiffs Amanda Nunez and Marlisha L. James (“Plaintiffs”) will apply for an

1 order: (1) preliminarily approving the proposed settlement of this class action with
2 Defendant University Healthcare Alliance a.k.a. Stanford Medicine Partners (“Defendant”);
3 (2) for settlement purposes only, conditionally certifying the Class, which is comprised of
4 “all individuals who were employed by Defendant in the State of California and classified as
5 non-exempt employees at any time during the Class Period”, which is March 12, 2022 to
6 June 14, 2025; (3) provisionally appointing Plaintiffs as the representatives of the Class; (4)
7 provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP, Centurion Trial
8 Attorneys, APC, and James Hawkins, APLC as Class Counsel; (5) approving the form and
9 method for providing class-wide notice; (6) directing that notice of the proposed settlement
10 be given to the Class; (7) appointing Apex Class Action as Administrator, and
11 (8) scheduling a final approval hearing date, proposed for June 23, 2026, to consider
12 Plaintiffs’ motion for final approval of the settlement and for approval of attorneys’ fees,
13 expenses and the service awards.

14 This unopposed motion for preliminary approval of the class settlement is brought
15 pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this
16 notice of motion and motion, the accompanying memorandum of points and authorities, the
17 Declaration of Kyle Nordrehaug, the Declaration of Ryan Stygar, the Declaration of James
18 Hawkins, the Declarations of the Plaintiffs, the Class Action and PAGA Settlement
19 Agreement (“Agreement”) between the Parties, and the complete files and records in this
20 action. Because all Parties have agreed to the proposed class settlement, this motion is not
21 opposed by Defendant.

22 Respectfully submitted,

23 Dated: October 1, 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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