

Janelle Carney (#201570)
JANELLE CARNEY- ATTORNEY AT LAW, APC
14758 Pipeline Avenue, Suite E
Chino Hills, CA 91709
Phone: 909.521.9609 / Fax: 909.393.0471
email: Janelle@JanelleCarneyLaw.com

Manny Starr, Esq. (Bar No. 319778)
manny@frontierlawcenter.com
Adam Rose (210880)
adam@frontierlawcenter.com
FRONTIER LAW CENTER
23901 Calabasas Road, #1084
Calabasas, CA 91302
Telephone: (818) 914-3433 / Fax: (818) 914-3433

Attorneys for Plaintiff, MARY WILKER

SUPERIOR COURT OF CALIFORNIA
COUNTY OF MARIN

MARY WILKER, on behalf of herself and all
others similarly situated,

Plaintiff,

vs.

SAN RAFAEL OPERATING COMPANY,
LP, a Delaware Limited Partnership;
MARINER HEALTH CENTRAL, Inc., a
Delaware Corporation, and DOES 1-100,
inclusive,

Defendants.

CASE NO. CV0001580
CLASS ACTION
Hon. Stephen Freccero

**NOTICE OF MOTION FOR COURT
APPROVAL OF PAGA SETTLEMENT**

Date: July 8, 2025
Time: 1:30 p.m.
Dept.: A

Action filed: December 14, 2023

1 PLEASE TAKE NOTICE that on July 8, 2025, at 1:30 p.m., or as soon thereafter as the
2 matter may be heard before the Honorable Stephen Freccero of the Superior Court of the State of
3 California, County of Marin located at 3501 Civic Center Drive, San Rafael, CA 94913-4988,
4 Plaintiff Mary Wilker ("Plaintiff") will and hereby does move for entry of an order and judgment as
5 follows:

6 1. Granting approval, pursuant to California *Labor Code* §2699, subd. (1)(2) of the
7 proposed settlement between Plaintiff and Defendants San Rafael Operating Company, LP ("San
8 Rafael") and Mariner Health Central, Inc. ("Mariner") (hereinafter collectively referred to as
9 "Defendants") of the claims brought pursuant to the Private Attorneys General Act of 2004
10 ("PAGA") as set forth in the PAGA Settlement Agreement ("Settlement Agreement"), attached as
11 **Exhibit 1** to the Declaration of Janelle Carney;

12 2. Approving the Net Distribution Amount payable to the State of California and
13 Aggrieved Employees as authorized by California *Labor Code* §2699(i):

14 a. Total PAGA Penalties: \$113,900.00

- 15 • Net Distribution Amount to Aggrieved Employees: \$28,475.00 (25%);
- 16 • Net Distribution Amount to the LWDA: \$85,425.00 (75%);

17 3. Appointing ILYM Group, Inc. ("ILYM") as the Settlement Administrator;

18 4. Directing Defendant to transmit settlement funds to the Settlement Administrator in
19 the total amount of \$205,000.00, as set forth in the Settlement Agreement;

20 5. Directing the Settlement Administrator to distribute the settlement funds to the
21 Aggrieved Employees, and distributing funds to the Labor and Workforce Development Agency
22 ("LWDA"), Plaintiff's Counsel, and for Settlement Administration Costs, in accordance with the
23 terms of the Settlement Agreement;

24 6. Awarding to Plaintiff's Counsel the amount of \$71,750.00 as compensation for
25 reasonable attorneys' fees ("Attorneys' Fees Payment"), up to \$15,000.00 for reimbursement of
26 litigation costs and expenses ("Litigation Costs Payment"), and up to \$3,350.00, for Settlement
27 Administration Costs.

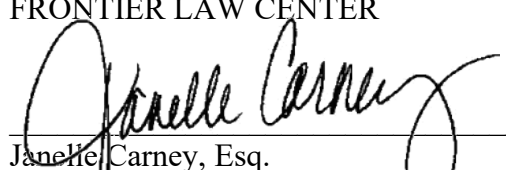
28 This motion is based on this Notice of Motion and Motion, the Memorandum of Points and
Authorities, the Settlement Agreement, the Declarations of Janelle Carney and Mary Wilker, the

1 pleadings and other records on file with the Court in this matter, and such evidence and oral
2 argument as may be presented at the hearing on this Motion.

3
4 Dated: April 15, 2025

JANELLE CARNEY- ATTORNEY AT LAW, APC
FRONTIER LAW CENTER

5
6 By:


Janelle Carney, Esq.
Attorneys for Plaintiff, Mary Wilker

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

I am employed in the County of San Bernardino, State of California. I am over the age of eighteen (18) and not a party to the within action; my business address is 14758 Pipeline Avenue, Suite E, Second Floor, Chino Hills, CA 91709-6025.

On April 15, 2025, I served the foregoing document described as:

NOTICE OF MOTION FOR COURT APPROVAL OF PAGA SETTLEMENT

on INTERESTED PARTIES in this action as stated below:

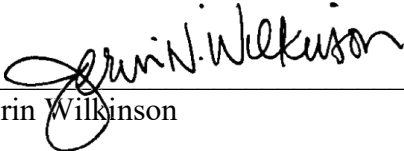
O'HAGAN MEYER LLP
MELISSA T. DAUGHERTY
ANDREW J. SOKOLOWSKI
550 S. Hope Street, Suite 2400
Los Angeles, California 90071
mdaugherty@ohaganmeyer.com
asokolowski@ohaganmeyer.com
mordonez@ohaganmeyer.com

Manny Starr, Esq.
Adam Rose
FRONTIER LAW CENTER
23901 Calabasas Road, #1084
Calabasas, CA 91302
manny@frontierlawcenter.com
adam@frontierlawcenter.com
eservice@frontierlawcenter.com

XX BY E-MAIL: I electronically served the above-mentioned document to each of the above recipients at their respective e-mail addresses. My e-address is: Jerin@janellecarneylaw.com

Executed on April 15, 2025, at Chino Hills, California.

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



Jerin Wilkinson