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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF BUTTE

CHRISTIAN LOVGREN and GINA
CUNEO, individuals, on behalf of
themselves, and on behalf of all persons
similarly situated, and on behalf of the
State of California, as private attorneys
general,

Plaintiffs,

vs.

ENLOE MEDICAL CENTER, a
California Corporation; and DOES 1
through 50, inclusive,

Defendants.

CASE NO.: **24CV00200**

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

Hearing Date: June 25, 2025

Hearing Time: 9:00 a.m.

Judge: Hon. Stephen E. Benson
Dept.: 6

Date Action Filed: January 18, 2024

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on June 25, 2025 in
Department 6 at the above entitled Court before the Honorable Stephen E. Benson, Plaintiffs
Christian Lovgren and Gina Cuneo ("Plaintiffs") will apply for an order: (1) preliminarily
approving the proposed settlement of this class action with Defendant Enloe Medical Center

1 (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class, which is
2 comprised of “all individuals who are or previously were employed by Defendant in
3 California and classified as a non-exempt employee at any time during the Class Period”,
4 which is October 1, 2022 to April 30, 2025; (3) provisionally appointing Plaintiffs as the
5 representatives of the Class; (4) provisionally appointing Blumenthal Nordrehaug Bhowmik
6 De Blouw LLP as Class Counsel; (5) approving the form and method for providing class-
7 wide notice of the settlement; (6) directing that notice of the proposed settlement be given to
8 the Class; (7) appointing ILYM Group, Inc. as Administrator; and, (8) scheduling a final
9 approval hearing date, proposed for November 12, 2025, to consider Plaintiffs’ motion for
10 final approval of the settlement and for approval of attorneys’ fees, expenses and the service
11 awards.

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

19 Respectfully submitted,

20 Dated: May 27, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

21 By: /s/ Kyle Nordrehaug
22 Kyle R. Nordrehaug, Esq.
23 Attorney for Plaintiffs
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