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on behalf of himself and others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SONOMA**

DANIEL JASSO, on behalf of himself
and all others similarly situated, and the
general public,

Plaintiff,

v.

SANTA ROSA POSTACUTE CARE,
LLC, a California corporation; SANTA
ROSAIDENCE OPCO, LLC, a
California corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 24CV01487

CLASS ACTION

Assigned for All Purposes To:
Hon. Patrick Broderick
Courtroom: 16

**NOTICE OF MOTION AND PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION AND PAGA
SETTLEMENT**

*[Filed concurrently with Memorandum of Points
and Authorities; Declaration of Enoch J. Kim;
Declaration of Kimberly Sutherland; Declaration
of Daniel Jasso; and [Proposed] Order]*

Date: October 15, 2025
Time: 3:00 P.M.
Dept.: 16

Original Complaint Filed: February 29, 2024
First Amended Complaint Filed: October 31, 2024
Trial Date: None Set

1 **TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on October 15, 2025, at 3:00 p.m. in Department 16 of the
3 Courthouse of the Sonoma County Superior Court located at 3035 Cleveland Avenue, Suite 200,
4 Santa Rosa, CA 95403, Plaintiff DANIEL JASSO (“Plaintiff”), on behalf of himself and other
5 similarly situated employees of Defendant SANTA ROSAIDENCE OPC, LLC dba SANTA
6 ROSA POST ACUTE (“Defendant”) (Plaintiff and Defendants together referred to as the
7 “Parties”), will and hereby do move this Court pursuant to California Code of Civil Procedure
8 § 382 and California Rule of Court 3.769 for an order as proposed:

- 9 (1) Preliminarily approving the class action settlement reached between Plaintiff and
10 Defendants, including granting preliminary approval of the following class: “all
11 current and former non-exempt employees of Defendant who worked in the state of
12 California at any time during the Class Period and who did not sign an arbitration
13 agreement,” which is the period from February 29, 2020, through November 8, 2024.
14 (2) Approving the form of Notice of Class Action Settlement and procedure for notice to
15 the class; and
16 (3) Setting the final approval hearing.

17 Pursuant to Labor Code § 2699.3(b)(4), the Parties also seek approval of the proposed
18 settlement’s allocation of funds to claims made under the Labor Code Private Attorneys General
19 Act of 2004 (“PAGA”).

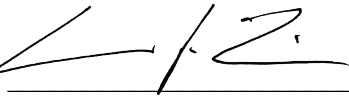
20 This Notice of Motion and Motion is based on the fact that this is a fair and reasonable
21 settlement that benefits the class and was the product of informed, non-collusive negotiations by
22 the parties who were represented by experienced and able counsel. *See Dunk v. Ford Motor Co.*
23 (1996) 48 Cal. App. 4th 1794, 1802; Manual for Complex Litigation (Second) (1985)§ 30.44. The
24 proposed settlement meets the legal standard for preliminary approval and is in the best interests
25 of the class; the proposed form of notice explains the settlement terms in a clear and
26 straightforward manner; the proposed procedures for notice provide the best practical notice to
27 the class; and that Class Members will have an opportunity to participate in and/or object to the
28 settlement and/or opt-out of the settlement. Defendant does not oppose the Motion.

1 This Notice of Motion and Motion is based on this Notice, and the exhibits thereto
2 (including the Notice to Class Members), the accompanying Memorandum of Points and
3 Authorities, the Declaration of Enoch J. Kim, the Declaration Kimberly Sutherland, the
4 Declaration of Daniel Jasso, the pleadings, records and files in the case, and such other further
5 oral and documentary evidence which may be submitted at or before the hearing on this Motion.
6

7 Dated: September 22, 2025

Respectfully submitted,

8 D.LAW, INC.

9
10 By 

Emil Davtyan
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Enoch J. Kim
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and others similarly situated