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Attorneys for Plaintiff
APRIL THOMASON

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF EL DORADO

APRIL THOMASON, on behalf of herself, and
all aggrieved employees,

Plaintiff,

v.

SEQUOIA SENIOR LIVING LLC, and DOES
1 through 50, inclusive,

Defendants.

Case No: 24CV0979

REPRESENTATIVE ACTION

**NOTICE OF MOTION AND MOTION
FOR AN ORDER APPROVING
SETTLEMENT OF PAGA ACTION AND
DISMISSING ACTION WITH PREJUDICE**

Date: TBD
Time: TBD
Dept. 9

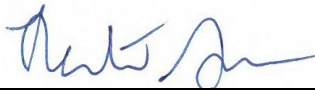
Complaint Filed: May 10, 2024
Trial Date: TBD

PLEASE TAKE NOTICE THAT on a date and time to be determined by the Court, or as soon thereafter as the matter may be heard, in Department 09 of the above-entitled Court, located at 3321 Cameron Park Drive, Cameron Park, California 95682, Plaintiff April Thomason (“Plaintiff”), will and hereby does move unopposed for an Order: (1) granting approval, pursuant to California Labor Code § 2699(1)(2), of the proposed settlement of claims brought pursuant to the Labor Code Private Attorneys General Act of 2004 (Labor Code §§ 2698 *et seq.*) against Defendant Sequioa Senior Living LLC, set forth in the parties’ Labor Code Private Attorneys General Act Settlement Agreement (the “Settlement Agreement”); (2) appointing Simpluris, Inc. as the Settlement Administrator; and (3) directing disbursement of the Settlement Amount pursuant to the terms of the Settlement Agreement.

This motion will be based on this Notice, the supporting memorandum of points and authorities, the Settlement Agreement, the Declarations of Robert Spencer and April Thomason, the documents and records on file in this matter, and such additional arguments, authorities, and evidence and other matters as may be presented by the Parties hereafter.

Dated: April 24, 2025

KELLER GROVER LLP

By: 

ERIC A. GROVER
ROBERT SPENCER
Counsel for Plaintiff
APRIL THOMASON

PROOF OF SERVICE

I, JOEY GONZALEZ, am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to the within action. My business address is 1965 Market Street, San Francisco, California 94103. On **April 24, 2025**, in the case of *April Thomason v. Sequoia Senior Living LLC*, El Dorado Superior Court Case Number 24CV0979, I served the foregoing document(s):

NOTICE OF MOTION AND MOTION FOR AN ORDER APPROVING SETTLEMENT OF PAGA ACTION AND DISMISSING ACTION WITH PREJUDICE

on the interested party(ies) below, using the following means:

Jeremy Millstone, Esq.

Attorneys for Defendant

Angelea Day

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☒	(BY ELECTRONIC SERVICE) by electronically mailing a true and correct copy in PDF format through our electronic mail system to the email address(es) set forth above, or as stated on the attached service list per agreement between the parties.
☒	(STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



JOEY GONZALEZ