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Attorneys for Plaintiff GOLDAMEIR CLEMENTE,

on behalf of himself and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SONOMA

GOLDAMEIR CLEMENTE, an
individual on behalf of himself and all
others similarly situated,

Plaintiff,

vs.

WEST COUNTY HEALTH CENTERS,
INC., a California non-profit corporation;
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 24CV033568

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 Julie Green; Declaration of
Goldameir Clemente; and and [Proposed] Order]*

Date:

Time:

Dept.: 16

Original Complaint Filed: February 29, 2024

First Amended Complaint Filed: October 31, 2024

Trial Date: None Set

TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on _____, 2026, at _____m. in

Department 16 of the Courthouse of the Sonoma County Superior Court located at 3035

1 Cleveland Avenue, Suite 200, Santa Rosa, CA 95403, Plaintiff Goldameir Clemente (“Plaintiff”),
2 on behalf of himself and other similarly situated employees of Defendant West County Health
3 Centers, Inc. (“Defendant”) (Plaintiff and Defendant together referred to as the “Parties”), will
4 and hereby do move this Court pursuant to California Code of Civil Procedure § 382 and
5 California Rule of Court 3.769 for an order as proposed:

6 (1) Preliminarily approving the class action settlement reached between Plaintiff and
7 Defendants, including granting preliminary approval of the following class: “all
8 persons employed by Defendant in California and classified as non-exempt, hourly
9 employees who worked for Defendant during the Class Period,” which is the period
10 from June 13, 2020 through October 31, 2025.

11 (2) Approving the form of Notice of Class Action Settlement and procedure for notice to
12 the class; and

13 (3) Setting the final approval hearing.

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

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

26 This Notice of Motion and Motion is based on this Notice, and the exhibits thereto
27 (including the Notice to Class Members), the accompanying Memorandum of Points and
28 Authorities, the Declaration of Enoch J. Kim, the Declaration Julie Green, the Declaration of

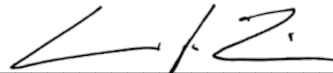
1 Goldameir Clemente, the pleadings, records and files in the case, and such other further oral and
2 documentary evidence which may be submitted at or before the hearing on this Motion.

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5 Dated: July 13, 2026

Respectfully submitted,

6 D.LAW, INC.

7
8 By



9 Natalie Haritounian
10 Enoch J. Kim
11 Matthew Carraher

12 Attorneys for Plaintiff on behalf of himself
13 and others similarly situated
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