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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN FRANCISCO**

ANDREA COOKS, an individual, on
behalf of herself and on behalf of all
persons similarly situated,

Plaintiff,

vs.

ON LOK COMMUNITY HOUSING,
INC., a California Corporation; ON LOK
DAY SERVICES, a California
Corporation; ON LOK HOUSE, INC., a
California Corporation; ON LOK
SENIOR HEALTH SERVICES, a
California Corporation; ON LOK, INC., a
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: **CGC-24-620841**

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

Hearing Date: September 23, 2026
Hearing Time: 9:00 a.m.

Judge: Hon. Christine Van Aken
Dept.: 301

Date Action Filed: December 20, 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 September 23, 2026 in
Department 301 at the above entitled Court before the Honorable Christine Van Aken,

1 Plaintiff Andrea Cooks ("Plaintiff") will apply for an order: (1) preliminarily approving the
2 proposed settlement of this class and PAGA action with Defendants On Lok Community
3 Housing, Inc., On Lok Day Services, On Lok House, Inc., On Lok Senior Health Services,
4 and On Lok, Inc. ("Defendants"); (2) for settlement purposes only, conditionally certifying
5 the Class, which is comprised of "all individuals who are or previously were employed by
6 Defendants who were classified as non-exempt in the State of California during the Class
7 Period.", which is December 20, 2020 to December 31, 2025; (3) provisionally appointing
8 Plaintiff as the representative of the Class; (4) provisionally appointing Blumenthal
9 Nordrehaug Bhowmik De Blouw LLP as Class Counsel; (5) approving the form and method
10 for providing class-wide notice; (6) directing that notice of the proposed settlement be given
11 to the Class; (7) appointing Apex Class Action LLC as Administrator, and (8) scheduling a
12 final approval hearing date, proposed for February 17, 2027, to consider Plaintiff's motion
13 for final approval of the settlement and for approval of attorneys' fees, expenses and the
14 service award.

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

22 Respectfully submitted,

23 Dated: August 26, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

24 By: /s/ Kyle Nordrehaug
25 Kyle R. Nordrehaug, Esq.
26 Attorney for Plaintiff
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