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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF HUMBOLDT

ELIJAH HEIFETZ, an individual, on
behalf of himself and on behalf of all
persons similarly situated, and on behalf
of the State of California, as a private
attorney general,

Plaintiff,

vs.

OPEN DOOR COMMUNITY HEALTH
CENTERS, a Corporation; and DOES 1
through 50, inclusive,

Defendants.

CASE NO.: **CV2401704**

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

Hearing Date: March 16, 2026

Hearing Time: 10:30 a.m.

Judge: Hon. Timothy A. Canning
Dept.: 4

Date Action Filed: September 10, 2024

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on March 16, 2026 in
Department 4 at the above entitled Court before the Honorable Timothy A. Canning,
Plaintiff Elijah Heifetz ("Plaintiff") will apply for an order: (1) preliminarily approving the

1 proposed settlement of this class and PAGA action with Defendant Open Door Community
2 Health Centers (“Defendant”); (2) for settlement purposes only, conditionally certifying the
3 Class, which is comprised of “all individuals who are or previously were employed by
4 Defendant who were classified as non-exempt in the State of California during the Class
5 Period”, which is September 10, 2020, through October 19, 2025; (3) provisionally
6 appointing Plaintiff as the representatives of the Class; (4) provisionally appointing
7 Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel; (5) approving the form
8 and method for providing class-wide notice; (6) directing that notice of the proposed
9 settlement be given to the Class; (7) appointing Apex Class Action LLC as Administrator,
10 and (8) scheduling a final approval hearing date, proposed for August 17, 2026, to consider
11 Plaintiff’s motion for final approval of the settlement and for approval of attorneys’ fees,
12 expenses and the representative service award.

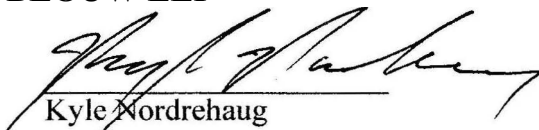
13 This unopposed motion for preliminary approval of the class and PAGA settlement is
14 brought pursuant to California Rules of Court, rule 3.769. Plaintiff’s motion will be based
15 on this notice of motion and motion, the accompanying memorandum of points and
16 authorities, the Declaration of Kyle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

20 Respectfully submitted,

21 Dated: February 20, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

By:



Kyle Nordrehaug
Attorney for Plaintiff