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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

ROSANIEVES MORAN, SHALECIA
WILLAIMS, and MARY
CANTERBURY individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

SHARP HEALTHCARE, a California
Corporation; and DOES 1-50, inclusive,

Defendants.

Case No. 37-2019-00050203-CU-OE-CTL

[Consolidated with
Case No. 37-2021-00041988-CU-OE-CTL
Case No. 37-2021-00051867-CU-OE-CTL]

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

Hearing Date: April 7, 2023
Hearing Time: 10:30 a.m.

Judge: Hon. Richard S. Whitney
Dept: 68

Action Filed: September 23, 2019
Trial Date: Not Set

1 **TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT on April 7, 2023 at 10:30 a.m., in
3 Department 68 of the above entitled Court before the Honorable Richard S. Whitney,
4 Plaintiffs Rosanieves Moran, Shaliecia Williams and Mary Canterbury (“Plaintiffs”) will
5 apply for an order: (1) preliminarily approving the proposed settlement of this class action
6 with Defendant Sharp Healthcare (“Defendant”); (2) for settlement purposes only,
7 conditionally certifying the Class, which is comprised of “all current and former non-exempt
8 employees of Defendant, excluding bargaining unit nurses, during the Class Period” of
9 September 23, 2015 through March 12, 2023; (3) provisionally appointing Plaintiffs as the
10 representatives of the Class; (4) provisionally appointing James R. Hawkins and Greg Mauro
11 of James Hawkins APLC and Norman Blumenthal, Kyle Nordrehaug and Nicholas De
12 Blouw of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the Class;
13 (5) approving the form and method for providing class-wide notice; (6) directing that notice
14 of the proposed settlement be given to the class; (7) appointing ILYM Group as Settlement
15 Administrator, and (8) scheduling a final approval hearing date to consider Plaintiffs’
16 motion for final approval of the settlement and entry of the Judgment, and Plaintiffs’ motion
17 for approval of attorneys' fees and expenses.

18 This motion for preliminary approval of the class settlement is brought pursuant to
19 California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this notice of
20 motion and motion, the accompanying memorandum of points and authorities, the
21 Declaration of Kyle Nordrehaug, the Declaration of James Hawkins, the Joint Stipulation of
22 Class Action and Private Attorney General Act (“PAGA”) Settlement and Release
23 (“Settlement”) between the parties, and the complete files and records in this action.
24 Because all parties have agreed to the proposed class settlement, this motion is not opposed
25 by Defendant.

26 Respectfully submitted,

27 Dated: March 14, 2023

JAMES HAWKINS APLC

28 By: /s/ Greg Mauro

James R. Hawkins, Esq.
Gregory Mauro, Esq.

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

By: /s/ Kyle Nordrehaug
Norman B. Blumenthal, Esq.
Kyle R. Nordrehaug, Esq.

Attorney for Plaintiffs