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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

JACQUELYN CRANTON and
KATRENA ARNOLD, individuals, on
behalf of themselves and on behalf of all
persons similarly situated,

Plaintiffs,

vs.

GROSSMONT HOSPITAL
CORPORATION, a California
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: 37-2022-00001574-CU-OE-CTL

[Consolidated with Case No.

37-2022-00024671-CU-OE-CTL]

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

Hearing Date: March 29, 2024

Hearing Time: 9:30 a.m.

Judge: Hon. Gregory W. Pollack
Dept.: 71

Action Filed: January 13, 2022

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on March 29, 2024 in
Department 71 at the above entitled Court before the Honorable Gregory W. Pollack,
Plaintiffs Jacqueline Cranton and Katrena Arnold ("Plaintiffs") will apply for an order:

(1) preliminarily approving the proposed settlement of this class action with Defendant Grossmont Hospital Corporation (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class, which is comprised of “all non-exempt employees who are or previously were employed by Defendant Grossmont Hospital Corporation in the State of California from January 13, 2018 to March 20, 2024 (the “Class Period”)”; (3) provisionally appointing Plaintiffs as the representatives of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik, Nicholas J. De Blouw, Jeffrey S. Herman, Sergio J. Puche, and Trevor G. Moran of Blumenthal Nordrehaug Bhowmik De Blouw LLP; Craig J Ackermann of Ackermann & Tilajef, P.C.; and Amir H. Seyedfarshi of Employment Rights Lawyers, APC as Class Counsel; (5) approving the form and method for providing class-wide notice; (6) directing that notice of the proposed settlement be given to the class; (7) appointing ILYM Group as Administrator, and (8) scheduling a final approval hearing date, proposed for August 9, 2024 which is at least 120 days from preliminary approval, to consider Plaintiffs’ motion for final approval of the settlement and for approval of attorneys’ fees and expenses.

This unopposed motion for preliminary approval of the class settlement is brought pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this notice of motion and motion, the accompanying memorandum of points and authorities, the Declaration of Kyle Nordrehaug, the Declaration of Craig J Ackermann, the Declaration of Amir H. Seyedfarshi, the Declarations of the Plaintiffs, the Class Action and PAGA Settlement Agreement (“Agreement”) between the Parties, and the complete files and records in this action. Because all Parties have agreed to the proposed class settlement, this motion is not opposed by Defendant.

Respectfully submitted,

Dated: March 4, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

By: /s/ Kyle Nordrehaug
Kyle R. Nordrehaug, Esq.
Attorney for Plaintiffs