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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

DORETHA JACKSON, on behalf of herself
and on behalf of all persons similarly situated,

Plaintiffs,

vs.

WHITE FIR HOLDINGS, LLC d/b/a MID-
TOWN OAKS POST-ACUTE, a Delaware
Limited Liability Company; PLUM
HEALTHCARE FOUNDATION, a California
Corporation; PLUM HEALTHCARE GROUP,
LLC, a California Limited Liability Company;
GI SIDE FUND PLUM CORP., a Delaware
Corporation; CALIFORNIA OPCO SUB, LLC,
a Delaware Limited Liability Company; and
DOES 1-50, Inclusive.

Defendants.

Case No. 34-2021-00301656

**NOTICE OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: October 6, 2023

Time: 9:00 a.m.

Judge: Hon. Lauri A. Damrell

Dept.: 28

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on October 6, 2023, or as soon
3 thereafter as the matter can be heard, in Department 28 of the above-entitled Court, before the
4 Honorable Judge Lauri A. Damrell, Plaintiff DORETHA JACKSON ("Plaintiff") will apply for an
5 order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the
6 Final Approval Order and Judgment.

7 This Motion is brought in accordance with the Preliminary Approval Order dated June 16,
8 2023, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Stipulation of Settlement of Class Action and PAGA
10 Claims and Release of Claims (hereinafter the "Agreement"), the Declaration of Shani O. Zakay,
11 the Declaration of Jean-Claude Lapuyade, the Declaration of the Plaintiff, and the complete files
12 and records in this action.

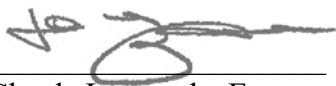
13 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this
14 matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative rulings for
15 the department may be downloaded from the Court's public access site. If you do not have online
16 access, you may call the dedicated phone number for the department as referenced in the local
17 telephone directory, between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the
18 hearing and listen to the tentative ruling. If you do not call the court and the opposing party by 4:00
19 p.m. the court day before the hearing, no hearing will be held.

20 Because all parties have agreed to the proposed class settlement and have met and conferred
21 regarding the motion, this motion is not opposed by Defendant. To date, there have been no
22 objections submitted by the Class.

23 Respectfully submitted,

24
25 Dated: September 12, 2023

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26 By: 
27 Jean-Claude Lapuyade, Esq.
28 Attorneys for Plaintiff