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

Hearing Date: April 28, 2023
Hearing Time: 9:00am
Department: 28

Trial Date: Not Set
Action Filed: May 27, 2021

Reservation No. 2712082

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00am on April 28, 2023 or as soon thereafter
3 as the matter can be heard, in Department 28 of the above entitled Court, before the Honorable
4 Judge Lauri Damrell, Plaintiff DORETHA JACKSON (“Plaintiff”) will apply for an order (1)
5 preliminary approving the proposed settlement of this class action with Defendants WHITE FIR
6 HOLDINGS, LLC d/b/a MID-TOWN OAKS POST-ACUTE, PLUM HEALTHCARE
7 FOUNDATION, PLUM HEALTHCARE GROUP, LLC, GI SIDE FUND PLUM CORP., and
8 CALIFORNIA OPCO SUB, LLC (“Defendants”); (2) approving the form and method for providing
9 class-wide notice; (3) directing that notice of the proposed settlement be given to the class; and (4)
10 scheduling a final approving hearing date to consider Plaintiff’s motion for final approval of the
11 settlement and entry of the Judgment, and Plaintiff’s motion for approval of attorneys’ fees and
12 litigation expenses.

13 This motion for preliminary approval of the class settlement is brought pursuant to
14 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of motion and
15 motion, the accompanying points and authorities, the Declaration of Shani O. Zakay, the
16 Declaration of Jean-Claude Lapuyade, the Stipulation of Settlement of Class and PAGA Action
17 Claims and Release of Claims (“Agreement”) between the parties, and the complete files and
18 records in this action. All parties have agreed to the proposed class settlement and have met and
19 conferred regarding the motion; therefore, this motion is not opposed by Defendants.

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

8 Respectfully submitted,

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10 DATED: March 31, 2023

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12 **ZAKAY LAW GROUP, APLC**

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14 By:  _____

15 Shani O. Zakay
16 Attorney for Plaintiff
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