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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

CHARLES P. SANDLIN III, on behalf of
himself, and others similarly situated,

Plaintiff,

v.

SECURE NURSING SERVICE, INC., a
California Corporation, and DOES 1-50,
inclusive,

Defendants.

Case No: 20STCV25675

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

Hearing Date: January 20, 2022
Hearing Time: 10:00AM

Honorable Judge Yvette M. Palazuelos
Department 9

Trial Date: Not Set
Action Filed: July 7, 2020

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 10:00 am on January 20, 2022, or as soon thereafter as the matter can be heard, in Department 9 of the above entitled Court, before the Honorable Judge Yvette M. Palazuelos, Plaintiff Charles Sandlin III (“Plaintiffs”) will apply for an order will apply for an order granting (1) Final Approval of the Class Action Settlement, and (2) Entry of the Final Approval Order and Judgment.

This Motion is brought in accordance with the Preliminary Approval Order dated September 17, 2021, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and authorities, the Class Action Settlement Agreement (hereinafter the “Agreement”), the Declarations of Shani O. Zakay, the Declaration of Jean-Claude Lapuyade, the Declaration of Lluvia Islas, (the Settlement Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

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

Respectfully submitted,

DATED: November 16, 2021

ZAKAY LAW GROUP, APLC

By:

Shani O. Zakay
Attorney for Plaintiff