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and the Proposed Settlement Class*

FILED
Superior Court of California
County of Los Angeles

02/14/2025

David W. Styrba, Executive Officer / Clerk of Court

By: I. Arellanes Deputy

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

SARAH PADRON, LORI HEUSER &
RYAN WILLIS, on behalf of
themselves and others similarly
situated as Private Attorney General
Representatives,

Plaintiffs,

vs.

AMI EXPEDITIONARY
HEALTHCARE, LLC, a Delaware
Limited Liability Company; AMI
EXPEDITIONARY HEALTHCARE
(USA), LLC, a Wyoming Limited
Liability Company; and DIGNITY
COMMUNITY CARE, a California
nonprofit public benefit corporation,

Defendants.

CASE NO.: 21STCV43932

Assigned to the Honorable Kenneth R. Freeman

[CLASS AND REPRESENTATIVE ACTION]

~~REVISED PROPOSED~~ ORDER

Date Action Filed: December 2, 2021

FAC Filed: May 2, 2023

Department: 14

Trial Date: None

Hearing Date: February 14, 2025

Hearing Time: 11:00AM _____

Based upon the Memorandum of Points and Authorities, the First Amended Settlement Agreement, Declarations of Named Plaintiffs Sarah Padron, Lori Heuser, and Ryan Willis, Plaintiffs' Counsel Caleb Marker, and Settlement Administrator representative Chris Longley, and all documents and arguments submitted in support thereof, the Court hereby **GRANTS** Plaintiffs' Motion For Preliminary Approval of Class, Collective, and PAGA Action Settlement Agreement as follows:

1. The Court preliminarily approves the First Amended Settlement Agreement;
2. The Court certifies the Class for settlement purposes only;
3. The Court approves the First Amended Notice attached as Exhibit A to the Agreement;
4. The Court directs the First Amended Notice to be sent to putative Class Members in the manner set forth therein;
5. The Court appoints Plaintiffs as Class Representatives;
6. The Court appoints Caleb Marker, David Cialkowski, and Jeff Westerman of Zimmerman Reed LLP as Class Counsel, and appoint Zimmerman Reed LLP as Lead Class Counsel, the entity entitled to reasonable attorneys' fees; and
7. The Court sets the following schedule:

EVENT	DATE
Deadline for Defendants to provide Class Data to settlement Administrator.	Within 15 calendar days of Preliminary Approval of the Agreement.
Notice mailing date.	Within 14 calendar days of Defendants' provision of the Class Data.
Deadline to postmark a Request for Exclusion or otherwise object to the Agreement.	Within 60 calendar days after the mailing of the Notice (plus an additional 14 calendar day for Class Members whose Notice was re-mailed)

<p>1 Deadline for Class Counsel to File</p> <p>2 Motion for Final Approval of Class</p> <p>3 Action and PAGA Settlement and</p> <p>4 Motion for Class Counsel Fees</p> <p>5 Payment, Class Counsel Litigation</p> <p>6 Expenses Payment, and Class</p> <p>7 Representative Service Payments</p>	<p>No later than 16 court days prior to</p> <p>the Final Approval Hearing.</p>
<p>Final Approval Hearing</p>	<p>CE * ~ • AJ 2025 at FEECE</p>

8 **IT IS SO ORDERED.**

9

10 Dated: 02/14/2025



By

Honorable Kenneth R. Freeman
Kenneth R. Freeman / Judge
Los Angeles County Superior Court Judge