	Carolyn H. Cottrell (SBN 166977)	
1	Caroline N. Cohen (SBN 278154) Scott L. Gordon (SBN 319872)	ELECTRONICALLY FILED
2	SCHNEIDER WALLACE COTTRELL KONECKY LLP	Superior Court of California, County of Tulare
3	2000 Powell Street, Suite 1400 Emeryville, California 94608	02/08/2024
4 5	Tel: (415) 421-7100 Fax: (415) 421-7105	By: Vanessa Minguela, Deputy Clerk
6	ccottrell@schneiderwallace.com ccohen@schneiderwallace.com sgordon@schneiderwallace.com	
7	Attorneys for Plaintiffs and Class Members	
8		
9	CUREDIOD COU	DT OF CALLEODNIA
10		RT OF CALIFORNIA  OF TULARE
11	COUNT	OF TULANE
12	LUCI GILLESPIE and ILEANA	Case No. VCU285376
13	SUASTEGUI, on behalf of themselves and all others similarly situated,	DROOF OF CERVICE OF BRODGER
14	Plaintiffs,	PROOF OF SERVICE OF PROPOSED SETTLEMENT AGREEMENT ON
15	v.	CALIFORNIA LABOR AND WORKFORCE DEVELOPMENT
16	PLUM HEALTHCARE GROUP, LLC, a California limited liability company; and	AGENCY
17	DOES 1-100, inclusive,	
18	Defendants.	Judge: Hon. Bret Hillman
19		Dept.: 7 Date: March 12, 2024
20		Time: 8:30 a.m.
21		Complaint Filed: December 17, 2020 Trial Date: None Set
22		That Date. None Set
23		
24		
25		
26		
27		
28		

1	PROOF OF SERVICE ON LWDA
2	I, Scott L. Gordon, declare the following:
3	I am over the age of eighteen years and not a party to the within entitled action. I am
4	employed at Schneider Wallace Cottrell Konecky LLP located at 2000 Powell Street, Suite 1400,
5	Emeryville, California 94608.
6	On February 8, 2024, I served the following documents described as:
7	• SETTLEMENT AGREEMENT
8 9	MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT
10	on the following interested party(s):
11	PAGA Administrator
12	Labor and Workforce Development Agency 1515 Clay Street, Suite 801
13	Oakland, California 94612 PAGAfilings@dir.ca.gov
14	<b>BY ELECTRONIC SERVICE</b> by electronically submitting true and correct copies in PDF format of the documents described above to the Labor and Workforce Development Agency
15 16	("LWDA") via the LWDA PAGA electronic filing system. I submitted the documents described above in each of the PAGA case files for each of the six Plaintiffs in Plaintiffs'
17	Consolidated Class and PAGA Complaint. True and correct copies of the respective submission confirmations from the LWDA PAGA electronic filing system and the confirmation emails from the LWDA are attached hereto as:
18	• Exhibit A - Luci Gillespie, LWDA-CM-815343-20
19	<ul> <li>Exhibit B - Ileana Suategui, LWDA-CM-815342-20</li> <li>Exhibit C - Trevor Harding, LWDA-CM-822863-21</li> </ul>
20	<ul> <li>Exhibit D - Joselito Guerrero, LWDA-CM-829958-21</li> <li>Exhibit E - Esther Corona, LWDA-CM-829956-21</li> </ul>
21	• Exhibit F - Mildred Arriaga, LWDA-CM-850649-21
22	
23	I declare under penalty of perjury under the laws of the State of California that the foregoing
24	is true and correct. Executed on February 8, 2024, at San Bruno, California.
25	0 2 0
26	Sq 3. ~
27	Scott L. Gordon

28

# Exhibit A

From: DIR PAGA Unit <lwdadonotreply@dir.ca.gov>

Sent: Thursday, February 8, 2024 5:12 PM

**To:** Scott L. Gordon

**Subject:** Thank you for your Proposed Settlement Submission

Notice: This email originated from outside of the organization. Please use caution before opening any attached file you did not expect from the sender. Contact support@langtech.com if in doubt.

02/08/2024 05:11:24 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of Labor and Workforce Development Agency

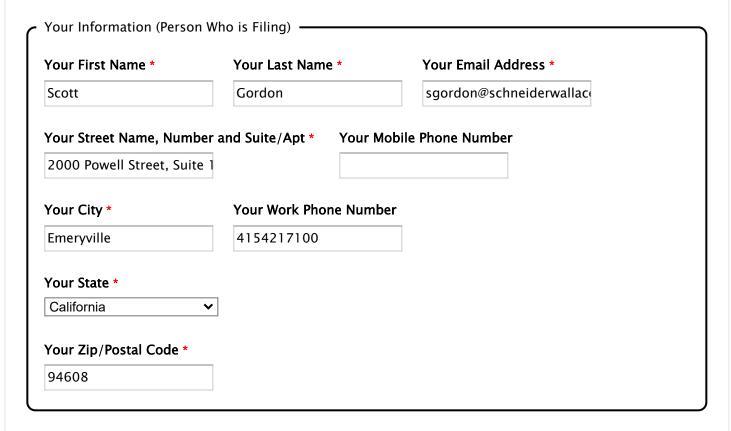
Website: https://protect-us.mimecast.com/s/KkEtCyPz2wCrJNvKuZ9sau

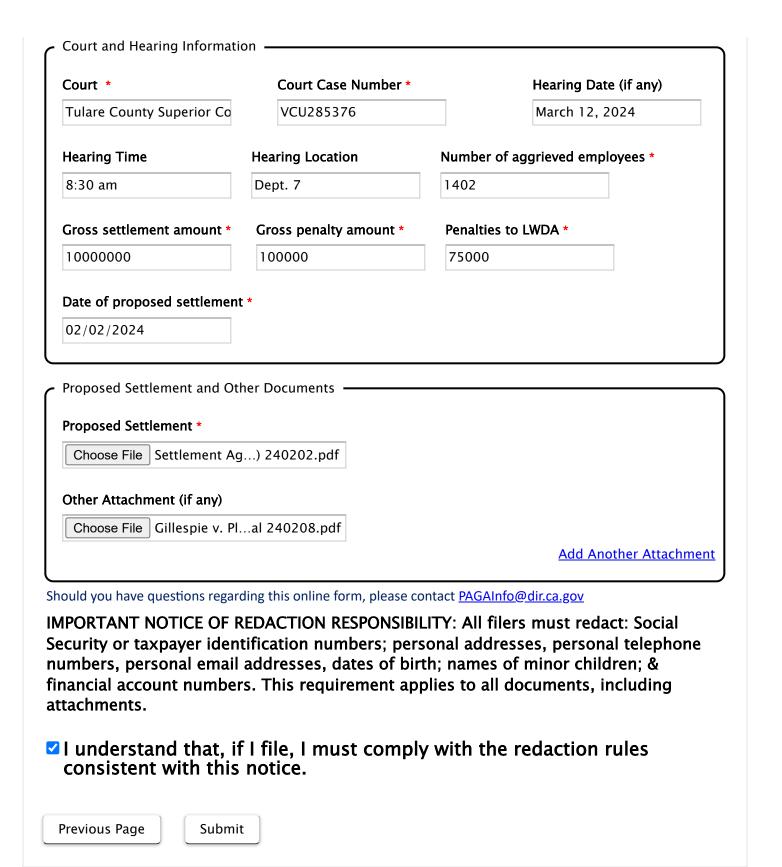


### **Proposed Settlement of PAGA case**

PAGA Number (LWDA-CM-) : * 81534
----------------------------------

Please enter only the eight digit number after "LWDA-CM-" in the following format, "XXXXXX-XX". Search for PAGA Case number





# Exhibit B

From: DIR PAGA Unit <lwdadonotreply@dir.ca.gov>

Sent: Thursday, February 8, 2024 5:10 PM

To: Scott L. Gordon

**Subject:** Thank you for your Proposed Settlement Submission

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02/08/2024 05:09:06 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

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DIR PAGA Unit on behalf of Labor and Workforce Development Agency

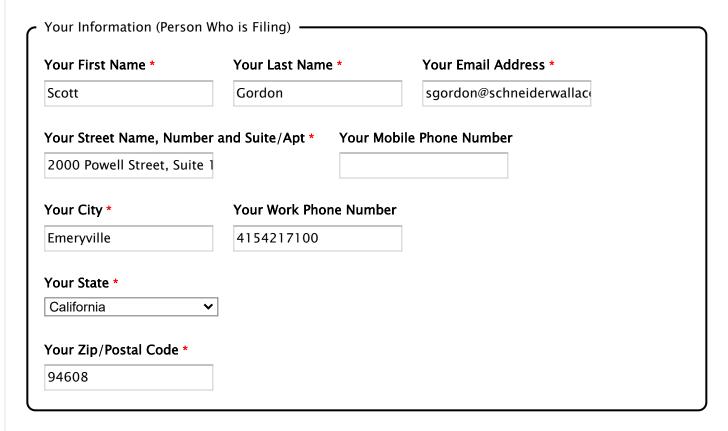
Website: https://protect-us.mimecast.com/s/hhdUC9rjY9fkxmByTo3bSR



### **Proposed Settlement of PAGA case**

PAGA Number (LWDA-CM-): * 815	342-20
-------------------------------	--------

Please enter only the eight digit number after "LWDA-CM-" in the following format, "XXXXXX-XX". Search for PAGA Case number



Court *	Court Case Number *	Hea	aring Date (if any)
Tulare County Superior Co	VCU285376	Ma	ırch 12, 2024
learing Time	Hearing Location	Number of aggrie	ved employees *
8:30 am	7	1402	
Gross settlement amount *	Gross penalty amount *	Penalties to LWD	<b>A</b> *
10000000	100000	75000	
pate of proposed settlement 02/02/2024			
Proposed Settlement *  Choose File Settlement Ago Other Attachment (if any)			
Other Attachment (if any)	j) 240202.pdf		Add Another Attachmen
Choose File Settlement *  Choose File Settlement Ago  Other Attachment (if any)  Choose File Gillespie v. Pl.	j) 240202.pdf	ntact <u>PAGAInfo@dir.c</u>	

# Exhibit C

From: DIR PAGA Unit <lwdadonotreply@dir.ca.gov>

Sent: Thursday, February 8, 2024 5:14 PM

To: Scott L. Gordon

**Subject:** Thank you for your Proposed Settlement Submission

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02/08/2024 05:13:12 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of Labor and Workforce Development Agency

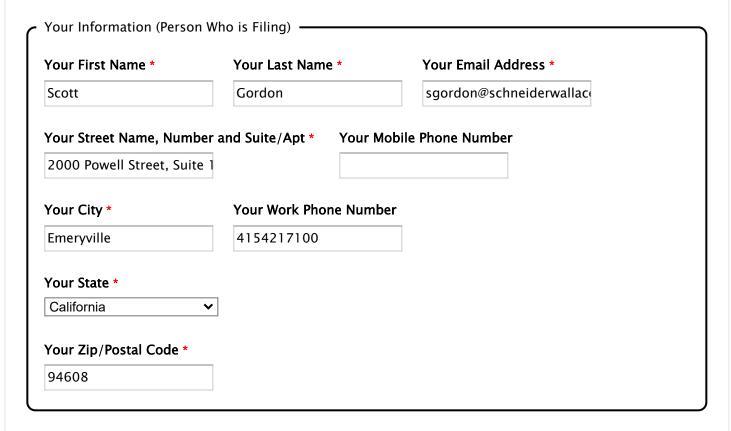
Website: https://protect-us.mimecast.com/s/qvZaCADrK6fNV9yMiGaRos

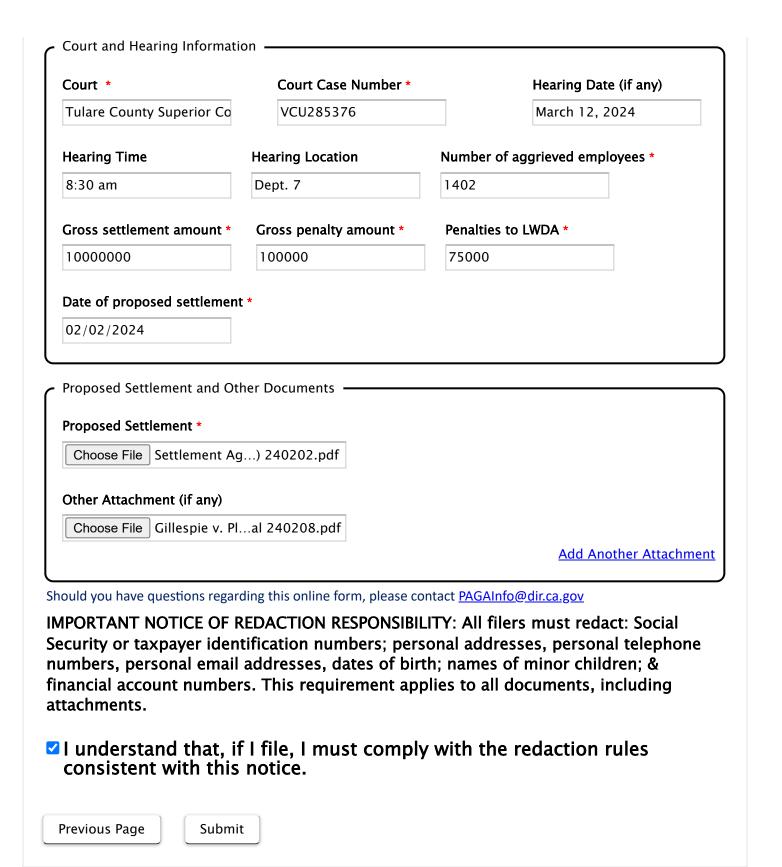


### **Proposed Settlement of PAGA case**

PAGA Number (LWDA-CM-) : *	822863-21

Please enter only the eight digit number after "LWDA-CM-" in the following format, "XXXXXX-XX". Search for PAGA Case number





# Exhibit D

From: DIR PAGA Unit <lwdadonotreply@dir.ca.gov>

Sent: Thursday, February 8, 2024 5:19 PM

**To:** Scott L. Gordon

**Subject:** Thank you for your Proposed Settlement Submission

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02/08/2024 05:18:27 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

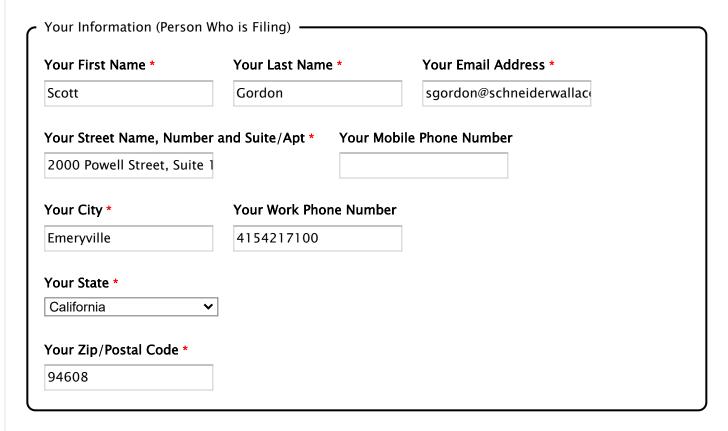
DIR PAGA Unit on behalf of Labor and Workforce Development Agency

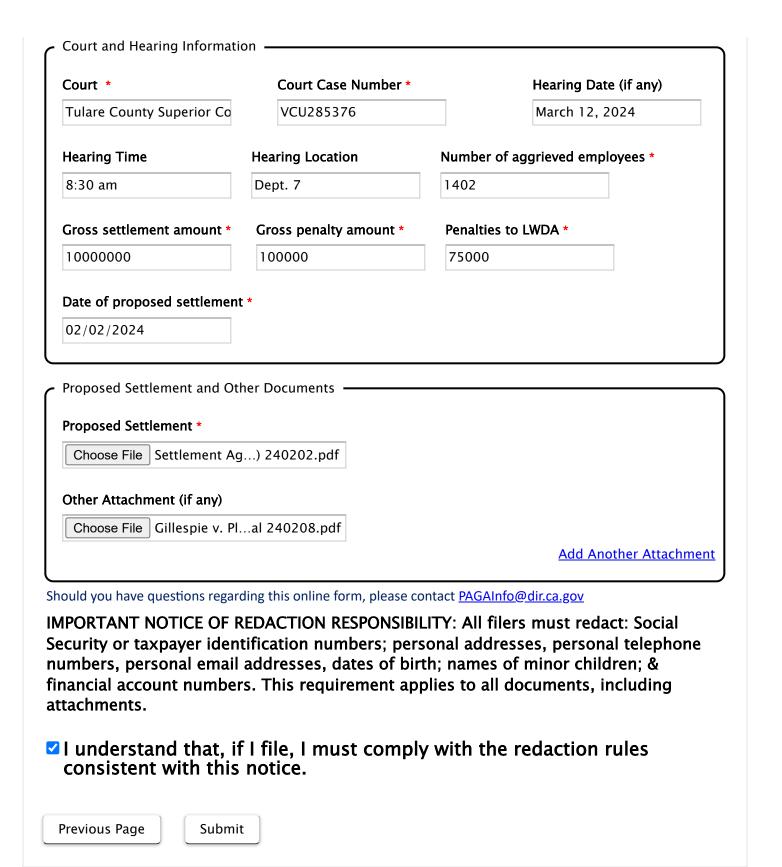
Website: https://protect-us.mimecast.com/s/800cCZ6gr8S5xMZ9Czm9U6



### **Proposed Settlement of PAGA case**

Please enter only the eight digit number after "LWDA-CM-" in the following format, "XXXXXX-XX". Search for PAGA Case number





# Exhibit E

From: DIR PAGA Unit <lwdadonotreply@dir.ca.gov>

Sent: Thursday, February 8, 2024 5:20 PM

To: Scott L. Gordon

**Subject:** Thank you for your Proposed Settlement Submission

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02/08/2024 05:19:44 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of

Labor and Workforce Development Agency

Website: https://protect-us.mimecast.com/s/iDzrC4x2G6HB6JNOCOaCfm

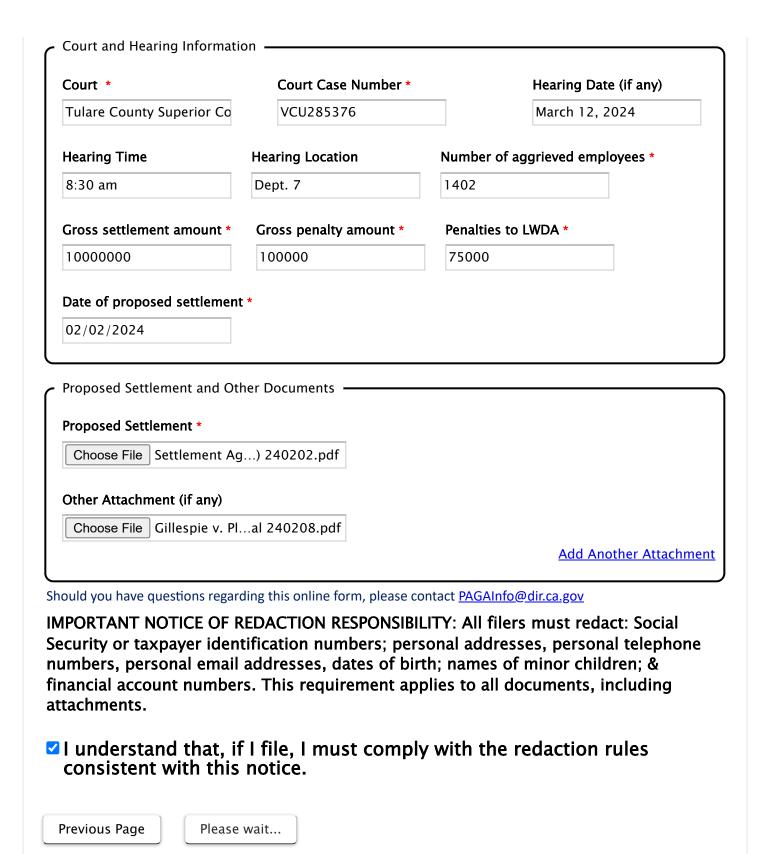


## **Proposed Settlement of PAGA case**

PAGA Number (LWDA-CM-) : *	829956-21	

Please enter only the eight digit number after "LWDA-CM-" in the following format, "XXXXXX-XX". <u>Search for PAGA Case number</u>

Your First Name *	Your Last Nam	e *	Your Email Address *
Scott	Gordon		sgordon@schneiderwallac
Your Street Name, Num	ber and Suite/Apt *	Your Mobil	e Phone Number
2000 Powell Street, Sui	te 1		
Your City *	Your Work Pho	ne Number	
Emeryville	4154217100		
Your State *			
California	•		
Your Zip/Postal Code *			
94608			



# Exhibit F

From: DIR PAGA Unit <lwdadonotreply@dir.ca.gov>

Sent: Thursday, February 8, 2024 5:22 PM

**To:** Scott L. Gordon

**Subject:** Thank you for your Proposed Settlement Submission

Notice: This email originated from outside of the organization. Please use caution before opening any attached file you did not expect from the sender. Contact support@langtech.com if in doubt.

02/08/2024 05:21:42 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to pagainfo@dir.ca.gov.

DIR PAGA Unit on behalf of

Labor and Workforce Development Agency

Website: https://protect-us.mimecast.com/s/VeAwC82gK3i6QjVRcnnq67



## **Proposed Settlement of PAGA case**

PAGA Number (LWDA-CM-) : *	850649-21	
----------------------------	-----------	--

Please enter only the eight digit number after "LWDA-CM-" in the following format, "XXXXXX-XX". Search for PAGA Case number

Your First Name *	Your Last Nam	e *	Your Email Address *	
Scott	Gordon		sgordon@schneiderwallac	
our Street Name, Num	ber and Suite/Apt *	Your Mobil	e Phone Number	
2000 Powell Street, Sui	te 1			
Your City *	Your Work Pho	ne Number		
Emeryville	4154217100			
Your State *				
California	•			
Your Zip/Postal Code *				
94608				

