

1 Carolyn H. Cottrell (SBN 166977)
2 Caroline N. Cohen (SBN 278154)
3 Scott L. Gordon (SBN 319872)
4 SCHNEIDER WALLACE
5 COTTRELL KONECKY LLP
6 2000 Powell Street, Suite 1400
7 Emeryville, California 94608
8 Tel: (415) 421-7100
9 Fax: (415) 421-7105
10 ccottrell@schneiderwallace.com
11 ccohen@schneiderwallace.com
12 sgordon@schneiderwallace.com

13 *Attorneys for Plaintiffs and Class Members*

ELECTRONICALLY FILED
Superior Court of California,
County of Tulare
02/08/2024
By: Vanessa Minguela,
Deputy Clerk

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF TULARE

LUCI GILLESPIE and ILEANA
SUASTEGUI, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

PLUM HEALTHCARE GROUP, LLC, a
California limited liability company; and
DOES 1-100, inclusive,

Defendants.

Case No. VCU285376

**PROOF OF SERVICE OF PROPOSED
SETTLEMENT AGREEMENT ON
CALIFORNIA LABOR AND
WORKFORCE DEVELOPMENT
AGENCY**

Judge: Hon. Bret Hillman
Dept.: 7
Date: March 12, 2024
Time: 8:30 a.m.

Complaint Filed: December 17, 2020
Trial Date: None Set

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PROOF OF SERVICE ON LWDA

I, Scott L. Gordon, declare the following:

I am over the age of eighteen years and not a party to the within entitled action. I am employed at Schneider Wallace Cottrell Konecky LLP located at 2000 Powell Street, Suite 1400, Emeryville, California 94608.

On February 8, 2024, I served the following documents described as:

- **SETTLEMENT AGREEMENT**
- **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS AND PAGA ACTION SETTLEMENT**

on the following interested party(s):

PAGA Administrator
Labor and Workforce Development Agency
1515 Clay Street, Suite 801
Oakland, California 94612
PAGAFilings@dir.ca.gov

BY ELECTRONIC SERVICE by electronically submitting true and correct copies in PDF format of the documents described above to the Labor and Workforce Development Agency ("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' 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:

- Exhibit A - Luci Gillespie, LWDA-CM-815343-20
- Exhibit B - Ileana Suategui, LWDA-CM-815342-20
- Exhibit C - Trevor Harding, LWDA-CM-822863-21
- Exhibit D - Joselito Guerrero, LWDA-CM-829958-21
- Exhibit E - Esther Corona, LWDA-CM-829956-21
- Exhibit F - Mildred Arriaga, LWDA-CM-850649-21

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 8, 2024, at San Bruno, California.



Scott L. Gordon

Exhibit A

Scott L. Gordon

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>



Private Attorneys General Act (PAGA) – Filing

Proposed Settlement of PAGA case

PAGA Number (LWDA-CM-) : *

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

The timing of the deposit of settlement checks is governed by the provisions of the State Administrative Manual. This ministerial, administrative act of depositing a settlement check mandated by state procedures should not be construed as nor does it constitute an unconditional, voluntary and/or absolute acceptance of settlement proceeds or approval of the terms of any settlement agreement or judgment related to that check.

Your Information (Person Who is Filing)

Your First Name *

Scott

Your Last Name *

Gordon

Your Email Address *

sgordon@schneiderwallac

Your Street Name, Number and Suite/Apt *

2000 Powell Street, Suite 1

Your Mobile Phone Number

Your City *

Emeryville

Your Work Phone Number

4154217100

Your State *

California

Your Zip/Postal Code *

94608

Court and Hearing Information

Court *

Tulare County Superior Co

Court Case Number *

VCU285376

Hearing Date (if any)

March 12, 2024

Hearing Time

8:30 am

Hearing Location

Dept. 7

Number of aggrieved employees *

1402

Gross settlement amount *

10000000

Gross penalty amount *

100000

Penalties to LWDA *

75000

Date of proposed settlement *

02/02/2024

Proposed Settlement and Other Documents

Proposed Settlement *

Settlement Ag... 240202.pdf

Other Attachment (if any)

Gillespie v. Pl...al 240208.pdf

[Add Another Attachment](#)

Should you have questions regarding this online form, please contact PAGAInfo@dir.ca.gov

IMPORTANT NOTICE OF REDACTION RESPONSIBILITY: All filers must redact: Social Security or taxpayer identification numbers; personal addresses, personal telephone numbers, personal email addresses, dates of birth; names of minor children; & financial account numbers. This requirement applies to all documents, including attachments.

I understand that, if I file, I must comply with the redaction rules consistent with this notice.

Exhibit B

Scott L. Gordon

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

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 05:09:06 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/hhdUC9rjY9fkxmByTo3bSR>



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Tulare County Superior Co

Court Case Number *

VCU285376

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March 12, 2024

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8:30 am

Hearing Location

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02/02/2024

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Proposed Settlement *

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Exhibit C

Scott L. Gordon

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

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 05:13:12 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>



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Exhibit D

Scott L. Gordon

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

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 05:18:27 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>



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Proposed Settlement *

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Exhibit E

Scott L. Gordon

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

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 05:19:44 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
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Website: <https://protect-us.mimecast.com/s/iDzrC4x2G6HB6JNOCOaCfm>



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Proposed Settlement *

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Exhibit F

Scott L. Gordon

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

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02/08/2024 05:21:42 PM

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

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DIR PAGA Unit on behalf of
Labor and Workforce Development Agency

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



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Proposed Settlement *

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