

EXHIBIT 3

1 NOSRATILAW, APLC
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10 MARJORIE SAINT HUBERT,
11 VALERIE MARTINEZ, and THERESE SVENGERT,
12 individually and on behalf of all others similarly situated

13 MARJORIE SAINT HUBERT, VALERIE
14 MARTINEZ, and THERESE SVENGERT,
15 individually and on behalf of all others
16 similarly situated,

17 Plaintiffs,

18 vs.

19 EQUINOX HOLDINGS, INC., a Foreign
20 Corporation; and DOES 1 through 50,
21 inclusive,

22 Defendants.

Case No.: 2:21-cv-00086-VAP-JEMx

CLASS ACTION

**PROPOSED SCHEDULE AND
PROCEDURE FOR COMPLETING
THE FINAL APPROVAL PROCESS**

Date: January 26, 2024

Time: 1:30 p.m.

Dept.: 6A

1 **PROPOSED SCHEDULE AND PROCEDURE FOR COMPLETING THE FINAL**
2 **APPROVAL PROCESS**

3 The Settlement Agreement contains a proposed schedule for notice of the Settlement,
4 as follows, which Plaintiff respectfully requests this Court to approve:
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6 1) Within thirty (30) calendar days of preliminary approval, defendant will provide the
7 class list to the settlement administrator. In the event defendant fails to provide a
8 complete class list within said 30 calendar days, defendant will provide the class list it
9 has compiled at that time to settlement administrator and then will have fifteen (15)
10 additional calendar days to provide the remainder of the class list to the settlement
11 administrator.

12 2) Within thirty (30) calendar days after receiving the class list from defendant, the
13 settlement administrator will mail a class notice to all class members via regular first-
14 class U.S. mail, using the most current, known mailing addresses identified in the class
15 list.

16 3) The Response Deadline will be extended for fifteen (15) calendar days for all
17 remailed Notices.

18 4) A final approval hearing for June 14, 2024 in Courtroom 6A of the United
19 States Central District of California courthouse, located at 350 West 1st Street, Los
20 Angeles, California 90012, to consider any objections that may be filed and to determine
21 whether the proposed settlement is fair, reasonable and adequate and should be finally
22 approved, and to determine the amount of attorneys' fees, costs, and expenses to be paid
23 to Class Counsel.

24 5) All memoranda, affidavits, declarations and other evidence in support of the
25 request for final approval of the settlement and attorneys' fees and costs shall be filed
26 within twenty-eight (28) calendar days prior to the above hearing.
27
28

1 Dated: December 14, 2023

NOSRATILAW, APLC

2 By: /s/ Omid Nosrati, Esq.

3 OMID NOSRATI

4 Attorney for Plaintiff,

5 MARJORIE SAINT HUBERT

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