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11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13
14 ISMAEL ORTEGA, KRISINDA
15 WOLFE, DORIS WILLIAMS-
16 JENKINS, and LILIA SILVA,
17 individuals, on behalf of themselves and
18 on behalf of all persons similarly
19 situated,

20 Plaintiffs,

21 vs.

22 LOYAL SOURCE GOVERNMENT
23 SERVICES, LLC, a Limited Liability
24 Company; and Does 1 through 50,
25 Inclusive,

26 Defendant.

CASE No. **3:20-cv-0879-LAB-NLS**

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

Hearing Date: March 22, 2021

Hearing Time: 11:30 a.m.

District Judge: Hon. Larry A. Burns
James M. Carter and Judith N. Keep
United States Courthouse
Courtroom 14A

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on March 22, 2021, at 11:30 a.m. in the
3 United States District Court for the Southern District of California, located at the James
4 M. Carter and Judith N. Keep United States Courthouse, 333 West Broadway, 14th
5 Floor, San Diego, CA 92101 in Courtroom 14A, before the Honorable Larry A. Burns,
6 Plaintiffs Ismael Ortega, Krisinda Wolfe, Doris Williams-Jenkins and Lilia Silva
7 (“Plaintiffs”) will move for preliminary approval of the proposed class settlement with
8 Defendant Loyal Source Government Services, LLC (“Defendant”). This motion is
9 unopposed as based on the Class Action Settlement Agreement ("Agreement") between
10 the Parties filed concurrently with this motion.

11 The motion will be based on this Notice of Motion, the Memorandum of Points
12 and Authorities, the Declaration of Kyle Nordrehaug, the argument of counsel and upon
13 such other material contained in the file and pleadings of this action.

14 Respectfully submitted,

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16 Dated: February 18, 2021

BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW

17 By: /s/ Kyle Nordrehaug
18 Norman B. Blumenthal
19 Kyle R. Nordrehaug
Attorneys for Plaintiffs