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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **IN AND FOR THE COUNTY OF LOS ANGELES**

15 EZEKIEL H. TREZEVANT IV, an
16 individual, on behalf of himself, and on
17 behalf of all persons similarly situated,
18 and on behalf of the State of California, as
19 a private attorney general,

20 Plaintiffs,

21 vs.

22 LEGENDS SALES & MARKETING,
23 LLC, a Limited Liability Company; and
24 Does 1 through 50, Inclusive,

25 Defendants.

CASE NO.: **20STCV45378**

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

Hearing Date: August 6, 2025
Hearing Time: 10:30 a.m.

Judge: Hon. Carolyn B. Kuhl
Dept: SS-12

Date Filed: November 24, 2020
Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on August 6, 2025, in
3 Department SS-12 at the Spring Street Courthouse in the above entitled Court before the
4 Honorable Carolyn B. Kuhl, Plaintiff Ezekiel H. Trezevant IV ("Plaintiff") will apply for an
5 order: (1) preliminarily approving the proposed settlement of this class and PAGA action
6 with Defendant Legends Sales & Marketing, LLC ("Defendant"); (2) confirming for
7 settlement purposes only, the previously certified Class, which is comprised of "all
8 individuals who are or previously were employed by Defendant in California as a Premium
9 Sales Consultant or a Senior Sales Consultant at any time during the "Class Period", which is
10 November 24, 2016 through March 19, 2024, who did not sign a severance agreement and
11 who did not opt out of the Class Action; (3) confirming Plaintiff as the representative of the
12 Class; (4) confirming Blumenthal Nordrehaug Bhowmik De Blouw LLP and the Webb Law
13 Group as Class Counsel; (5) approving the form and method for providing class-wide notice;
14 (6) directing that notice of the proposed settlement be given to the class; (7) appointing
15 Apex Class Action as Administrator, and (8) scheduling a final approval hearing date that is
16 120 days from preliminary approval, to consider Plaintiff's motion for final approval of the
17 settlement and for approval of attorneys' fees, expenses and service award.

18 This motion for preliminary approval of the class settlement is brought pursuant to
19 California Rules of Court, rule 3.769. Plaintiff's motion will be based on this notice of
20 motion and motion, the accompanying memorandum of points and authorities, the
21 Declaration of Kyle Nordrehaug, the Declaration of Lenden Webb, the Declaration of the
22 Plaintiff, the Class Action and PAGA Settlement Agreement ("Agreement") between the
23 Parties, and the complete files and records in this action. All Parties have agreed to the
24 proposed class settlement as set forth in the Agreement.

25 Respectfully submitted,

26 Dated: May 28, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

27 By: /s/ Kyle Nordrehaug
28 Kyle R. Nordrehaug, Esq.
Attorney for Plaintiff