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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF TULARE

MATTHEW RAMIREZ, ADAM
VILLASENOR, LUIS FLORES, STEVEN
SAEVANG, and PEDRO GUTIERREZ,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiff,

vs.

PREGIS INNOVATIVE PACKAGING LLC,
a Limited Liability Company; MANPOWER,
U.S. INC., a Corporation, and Does 1 through
50, Inclusive,

Defendants.

Case No.: **VCU285886**
Consolidated for All Purposes with
Case No. VCU285887

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

Hearing Date: February 14, 2023
Hearing Time: 8:30 a.m.

*[Hearing scheduled by Order dated August 18,
2022 at paragraph 12]*

Dept: 7
Judge: Hon. Bret Hillman

Action Filed: February 3, 2021
Trial Date: None set

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on February 14, 2023 or as soon thereafter
3 as the matter can be heard, in Department 7 of the above-entitled Court before the Honorable Bret
4 Hillman, Plaintiffs Matthew Ramirez, Adam Villasenor, Luis Flores, Steven Saevang, and Pedro
5 Gutierrez (“Plaintiffs”) will move for an order granting (1) Final Approval of the Class Action
6 Settlement, and (2) Entry of the Final Approval Order and Judgment.

7 This motion is brought in accordance with the Order dated August 18, 2022, and California
8 Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and
9 authorities, the Declaration of Norman Blumenthal, the Declaration of Madely Nava (the Settlement
10 Administrator), the declarations of Plaintiffs Matthew Ramirez, Adam Villasenor, Luis Flores, Steven
11 Saevang, and Pedro Gutierrez, the Class Action Settlement Agreement (the “Agreement”), and the
12 complete files and records in this action.

13 Because Plaintiffs and Defendants Pregis Innovative Packaging LLC (“Pregis”) and Manpower,
14 U.S. Inc. (“Manpower”) (collectively “Defendants”) have agreed to the proposed class settlement and
15 have met and conferred regarding the motion, this motion is not opposed. There have been no
16 objections submitted by the Class.

17 Respectfully submitted,

18 Dated: January 18, 2022

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

21 By: /s/ Kyle Nordrehaug
22 Norman B. Blumenthal
23 Kyle R. Nordrehaug
24 Attorney for Plaintiffs
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