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

14 **IN AND FOR THE COUNTY OF TULARE**

15 MATTHEW RAMIREZ, ADAM
16 VILLASENOR, LUIS FLORES,
17 STEVEN SAEVANG, and PEDRO
18 GUTIERREZ, individuals, on behalf of
19 themselves and on behalf of all persons
20 similarly situated,

21 Plaintiff,

22 vs.

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

28 Defendants.

Case No.: **VCU285886**

[Consolidated for All Purposes with
Case No. VCU285887]

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

Hearing Date: July 19, 2022

Hearing Time: 8:30 a.m.

Dept: 7

Judge: Hon. Bret Hillman

Action Filed: February 3, 2021

Trial Date: None set

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

YOU ARE HEREBY NOTIFIED THAT on July 19, 2022 at 8:30 a.m., in
Department 7 of the above entitled Court before the Honorable Bret Hillman, Plaintiffs

1 Matthew Ramirez, Adam Villasenor, Luis Flores, Steven Saevang, and Pedro Gutierrez
2 (“Plaintiffs”) will apply for an order: (1) preliminarily approving the proposed settlement of
3 this class action with Defendants Pregis Innovative Packaging LLC (“Pregis”) and
4 Manpower, U.S. Inc. (“Manpower”) (collectively “Defendants”); (2) for settlement purposes
5 only, conditionally certifying the Class, which is comprised of “all individuals who are or
6 previously were employed by Defendant Pregis and all individuals who were employed by
7 Defendant Manpower and assigned to work at a Pregis facility in California who were
8 classified as hourly non-exempt employees at any time during the Class Period” of May 8,
9 2018 through February 21, 2022; (3) provisionally appointing Plaintiffs as the
10 representatives of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R.
11 Nordrehaug, Aparajit Bhowmik, Nicholas J. De Blouw, and Jeffrey S. Herman of
12 Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the Class; (5)
13 approving the form and method for providing class-wide notice; (6) directing that notice of
14 the proposed settlement be given to the class; (7) appointing ILYM Group as Settlement
15 Administrator, and (8) scheduling a final approval hearing date to consider Plaintiffs’
16 motion for final approval of the settlement and entry of the Judgment, and Plaintiffs’ motion
17 for approval of attorneys' fees and expenses.

18 This unopposed motion for preliminary approval of the class settlement is brought
19 pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this
20 notice of motion and motion, the accompanying memorandum of points and authorities, the
21 Declaration of Kyle Nordrehaug, the Class Action Settlement Agreement (“Agreement”)
22 between the parties, and the complete files and records in this action. Because all parties
23 have agreed to the proposed class settlement, this motion is not opposed by Defendants.

24 Respectfully submitted,

25 Dated: June 17, 2022

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

26 By: /s/ Kyle Nordrehaug
27 Norman B. Blumenthal, Esq.
28 Kyle R. Nordrehaug, Esq.
Attorney for Plaintiffs