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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOSE JAUREGUI and JAVIER DEL
REAL, individuals, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

CYTEC ENGINEERED MATERIALS
INC., a Delaware corporation, CYTEC
INDUSTRIES INC., a Delaware
corporation, CYTEC AEROSPACE
MATERIALS (CA) INC., a California
corporation, CYTEC PROCESS
MATERIALS (CA) INC., a Delaware
corporation, SOLVAY USA INC., a
Delaware corporation, SOLVAY
CHEMICALS, INC., a Delaware
corporation, and DOES 1 through 50,
inclusive,

Defendant.

CASE No. **8:20-cv-02440-DOC-DFMx**

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

Hearing Date: January 31, 2022

Hearing Time: 8:30 a.m.

District Judge: Hon. David O. Carter
Ronald Reagan Federal Building and
United States Courthouse
Courtroom 9D

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

2 **PLEASE TAKE NOTICE THAT** on January 31, 2022, at 8:30 a.m. in the
3 United States District Court for the Central District of California, located at the Ronald
4 Reagan Federal Building and United States Courthouse, 411 West Fourth Street, Santa
5 Ana, CA 92701, in Courtroom 9D before the Honorable David O. Carter, Plaintiffs Jose
6 Jauregui and Javier Del Real (“Plaintiffs”) will move for preliminary approval of the
7 proposed class and PAGA settlement with Defendants Cytec Engineered Materials Inc.,
8 Cytec Industries Inc., Cytec Aerospace Materials (CA) Inc., Cytec Process Materials
9 (CA) Inc., Solvay USA Inc., and Solvay Chemicals, Inc. (“Defendants”). This motion
10 is unopposed as based on the Class Action Settlement Agreement ("Agreement")
11 between the Parties filed concurrently with this motion.

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

15 Respectfully submitted,

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17 Dated: December 14, 2021

BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW

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