

1 **BLUMENTHAL NORDREHAUG BHOWMIK**
2 **DE BLOUW LLP**

3 Norman B. Blumenthal (State Bar #068687)

4 Kyle R. Nordrehaug (State Bar #205975)

5 Aparajit Bhowmik (State Bar #248066)

6 2255 Calle Clara

7 La Jolla, CA 92037

8 Telephone: (858)551-1223

9 Facsimile: (858) 551-1232

10 Email: Kyle@bamlawca.com

11 Website: www.bamlawca.com

12 Attorneys for Plaintiff

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **IN AND FOR THE COUNTY OF SACRAMENTO**

15 ADRIAN AGUIRRE, an individual, on
16 behalf of himself and on behalf of all
17 persons similarly situated,

18 Plaintiff,

19 vs.

20 HEADLANDS VENTURES, LLC., a
21 California Limited Liability Company;
22 and DOES 1 through 50, Inclusive,

23 Defendants.

Case No. 34-2021-00297290-CU-OE-GDS

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

Hearing Date: January 27, 2023

Hearing Time: 9:00 a.m.

Reservation No. 2690820

Judge: Hon. Jill H. Talley

Dept. 25

Action Filed: March 24, 2021

Trial Date: Not Set

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

25 YOU ARE HEREBY NOTIFIED THAT on January 27, 2023 at 9:00 a.m., in
26 Department 25 of the above entitled Court before the Honorable Jill H. Talley, Plaintiff
27
28

1 Adrian Aguirre (“Plaintiff”) will apply for an order: (1) preliminarily approving the
2 proposed settlement of this class action with Defendant Headlands Ventures, LLC
3 (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class, which is
4 comprised of “all individuals employed by Defendant in California as hourly-paid,
5 non-exempt employees at any time during the Class Period”, which is the period of time
6 from March 24, 2017 through Jul 31, 2022; (3) provisionally appointing Plaintiff as the
7 representatives of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R.
8 Nordrehaug, and Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP as
9 Class Counsel for the Class; (5) approving the form and method for providing class-wide
10 notice; (6) directing that notice of the proposed settlement be given to the class; (7)
11 appointing ILYM Group as Settlement Administrator, and (8) scheduling a final approval
12 hearing date to consider Plaintiff’s motion for final approval of the settlement and entry of
13 the Judgment, and Plaintiff’s motion for approval of attorneys' fees and expenses.

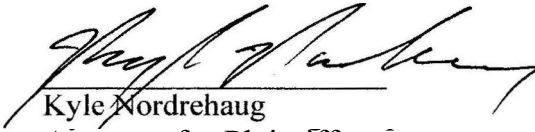
14 This motion for preliminary approval of the class settlement is brought pursuant to
15 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of
16 motion and motion, the accompanying memorandum of points and authorities, the
17 Declaration of Kyle Nordrehaug, the Class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

20 Respectfully submitted,

21 Dated: January 3, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

22 By:

23 
24 Kyle Nordrehaug
25 Attorney for Plaintiff
26
27
28