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Attorneys for Plaintiff

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

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

Plaintiff,

vs.

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

Defendants.

CASE No. **34-2021-00297290-CU-OE-GDS**

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

Hearing Date: June 9, 2023  
Hearing Time: 9:00 a.m.  
*[Hearing scheduled by Paragraph 12 of the  
Order dated January 27, 2023]*

Judge: Hon. Jill H. Talley  
Dept: 27

Action Filed: March 24, 2021  
Trial Date: Not Set

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on June 9, 2023 or as soon  
3 thereafter as the matter can be heard, in Department 27 of the above entitled Court before the  
4 Honorable Jill H. Talley, Plaintiff Adrian Aguirre ("Plaintiff") will move for an order granting  
5 (1) Final Approval of the Class Action Settlement, and (2) Entry of the Final Approval Order  
6 and the Judgment.

7 This motion is brought in accordance with the Order dated January 27, 2023, and  
8 California Rules of Court, rule 3.769. This Motion will be based on this notice, the  
9 accompanying points and authorities, the Declaration of Norman Blumenthal, the Class Action  
10 Settlement Agreement (the "Agreement"), the Declaration of Madely Nava (the Settlement  
11 Administrator), the Declarations of Plaintiff Aguirre, and the complete files and records in this  
12 action.

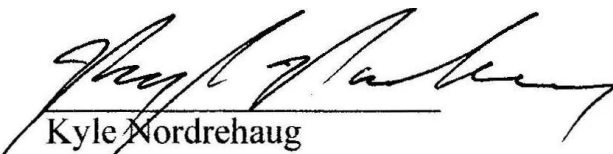
13 Because Plaintiffs and Defendant Headlands Ventures, LLC ("Defendant") have agreed  
14 to the proposed class settlement and have met and conferred regarding the motion, this motion  
15 is not opposed. There have been no objections submitted by the Class.

16 Respectfully submitted,

17 Dated: May 15, 2023

18 **BLUMENTHAL NORDREHAUG BHOWMIK  
DE BLOUW LLP**

19 By:

20   
21 Kyle Nordrehaug

22 Attorneys for Plaintiff  
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