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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **IN AND FOR THE COUNTY OF RIVERSIDE**
15

16 MARIA ZAMBRANO and ALFONSO
17 PEREZ URIBE, individually, on behalf of
18 themselves and on behalf of all persons
19 similarly situated,

20 Plaintiffs,

21 vs.

22 TUDOR RANCH, INC., a California
23 Corporation; and Does 1 through 50,
24 Inclusive,

25 Defendants.

CASE No. **CVRI2102436**

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

Hearing Date: January 30, 2024

Hearing Time: 8:30 a.m.

Judge: Hon. Harold W. Hopp

Dept: 1

Action Filed: May 27, 2021

Trial Date: Not Set

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on January 30, 2024, or as soon
3 thereafter as the matter can be heard, in Department 1 at the above entitled Court before the
4 Honorable Harold W. Hopp, Plaintiffs Maria Zambrano and Alfonso Uribe ("Plaintiffs") will apply
5 for an order: (1) preliminarily approving the proposed settlement of this class action with Defendant
6 Tudor Ranch, Inc. ("Defendant"); (2) for settlement purposes only, conditionally certifying the
7 following Class: "all individuals who are or previously were employed by Defendant in California
8 on a non-exempt basis at any time during the Class Period", which is May 27, 2017 to December
9 31, 2021; (3) provisionally appointing Plaintiffs as the representatives of the Class; (4)
10 provisionally appointing Norman B. Blumenthal, Kyle Nordrehaug, and Aparajit Bhowmik of
11 Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the Class; (5) approving the
12 form and method for providing class-wide notice; (6) directing that notice of the proposed
13 settlement be given to the class; (7) appointing ILYM Group as Administrator, and (8) scheduling a
14 final approval hearing for the proposed date of June 11, 2024 to consider Plaintiffs' motion for final
15 approval of the settlement and for approval of attorneys' fees and litigation expenses.

16 This motion for preliminary approval of the class settlement is brought pursuant to
17 California Rules of Court, rule 3.769. Plaintiffs' motion will be based on this notice of motion and
18 motion, the accompanying points and authorities, the Declaration of Kyle Nordrehaug, the
19 Declaration of the Plaintiffs, the Class Action and PAGA Settlement Agreement ("Agreement")
20 between the Parties, and the complete files and records in this action. Because all Parties have
21 agreed to the proposed class settlement, this motion is not opposed by Defendant.

22 Respectfully submitted,

23 Dated: January 3, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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