

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 Website: www.bamlawca.com

11 Attorneys for Plaintiff

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

16 JASON TAAD an individual, on behalf of
17 himself and on behalf of all persons
18 similarly situated,

19 Plaintiffs,

20 vs.

21 BIGGE CRANE AND RIGGING CO., a
22 California Corporation; and DOES 1
23 through 50, inclusive,

24 Defendants.

CASE No. **RG21103112**

[Consolidated with Case No. RG21103123]

**NOTICE OF MOTION AND MOTION
FOR FINAL APPROVAL OF CLASS
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS AND
SERVICE AWARD**

Hearing Date: October 10, 2024

Hearing Time: 3:00 p.m.

Reservation ID: A-21103112-002

[Hearing scheduled by Order dated May 30 ,
2024]

Judge: Hon. Sarah Stanford-Smith

Dept.: 17

Action Filed: June 29, 2021

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 3:00 p.m. on October 10, 2024, or as soon
3 thereafter as the matter can be heard, in Department 17 at the above entitled Court before the
4 Honorable Sarah Stanford-Smith, Plaintiff Jason Taad (“Plaintiff”) will move for an order
5 granting (1) Final Approval of the Class Action Settlement, including approval of the attorneys’
6 fees, costs and service award, and (2) Entry of the Final Approval Order and the Judgment.

7 This motion is brought in accordance with the Order dated May 30, 2024, and California
8 Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points
9 and authorities, the Declaration of Norman Blumenthal, the Class Action and PAGA Settlement
10 Agreement (the “Agreement”), the Declaration of Madely Nava (the Administrator), the
11 Declaration of Plaintiff, and the complete files and records in this action.

12 Because Plaintiff and Defendant Bigge Crane and Rigging Co. (“Defendant”) have
13 agreed to the proposed class settlement and have met and conferred regarding the motion, this
14 motion is not opposed. There have been no objections submitted by the Class.

15 Respectfully submitted,

16 Dated: September 13, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

18 By: /s/ Kyle Nordrehaug
19 Kyle R. Nordrehaug, Esq.
Attorneys for Plaintiff