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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

MIGUEL ATENCIO, FRANCISCO
NOGUERA, NICOLE LABEUCHERIE,
and EMIR LOUDHABACHI on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

STACHS LLC, a Limited Liability
Company; EAZE TECHNOLOGIES,
INC., a Corporation; and DOES 1 through
50, inclusive,

Defendants.

CASE NO.: **CGC-21-594434**

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

Hearing Date: June 4, 2024

Hearing Time: 9:30 a.m.

Judge: Hon. Richard B. Ulmer
Courtroom: 302

Action Filed: August 11, 2021

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on June 4, 2024 in Courtroom 2
3 at the above entitled Court before the Honorable Richard B. Ulmer, Plaintiffs Miguel
4 Atencio, Nicole Labeucherie, and Emir Loudhabachi (“Plaintiffs”) will apply for an order:
5 (1) preliminarily approving the proposed settlement of this class action with Defendants
6 Stachs, LLC and Eaze Technologies, Inc. (“Defendants”); (2) for settlement purposes only,
7 conditionally certifying the Class, which is comprised of “all current and former hourly-paid
8 or non-exempt employees of either of the Defendants and any of Defendants’ parents,
9 subsidiaries, or affiliates in California employed at any time during the Class Period” of
10 April 15, 2021 through December 11, 2023; (3) provisionally appointing Plaintiffs as the
11 representatives of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R.
12 Nordrehaug, and Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP as
13 Class Counsel; (5) approving the form and method for providing class-wide notice;
14 (6) directing that notice of the proposed settlement be given to the class; (7) appointing
15 ILYM Group, Inc. as Administrator, and (8) scheduling a final approval hearing date,
16 proposed for October 9, 2024 to consider Plaintiffs’ motion for final approval of the
17 settlement and for approval of attorneys’ fees and expenses.

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

25 Respectfully submitted,

26 Dated: May 2, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

27 By: /s/ Kyle Nordrehaug
28 Kyle R. Nordrehaug, Esq.
Attorney for Plaintiffs