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

15 LILIANA ANDERSON, on behalf of
16 herself and on behalf of all persons
17 similarly situated,

18 Plaintiff,

19 vs.

20 RAMM HOSPITALITY, INC., a
21 California Corporation; PRIME
22 HOSPITALITY SERVICES, LLC, a
23 California Limited Liability Company;
24 and DOES 1 through 50, inclusive,

25 Defendants.

Case No. BCV-21-101048

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

Hearing Date: August 1, 2023

Hearing Time: 8:30 a.m.

Judge: Hon. Eric Bradshaw
Div.: J

Date Filed: May 10, 2021

Trial Date: Not set

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

27 YOU ARE HEREBY NOTIFIED THAT on August 1, 2023 at 8:30 a.m., in Division
28 J of the above entitled Court before the Honorable Eric Bradshaw, Plaintiff Liliana
Anderson ("Plaintiff") will apply for an order: (1) preliminarily approving the proposed

1 settlement of this class action with Defendants Ramm Hospitality, Inc. and Prime
2 Hospitality Services, LLC (“Defendants”); (2) for settlement purposes only, conditionally
3 certifying the Class, which is comprised of “all individuals who were employed by
4 Defendants in California and classified as an hourly, non-exempt employee at any time
5 during the Class Period” of May 10, 2017 through February 4, 2023; (3) provisionally
6 appointing Plaintiff as the representative of the Class; (4) provisionally appointing Norman
7 B. Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik, Nicholas J. De Blouw, Jeffrey S.
8 Herman, and Sergio J. Puche of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class
9 Counsel for the Class; (5) approving the form and method for providing class-wide notice;
10 (6) directing that notice of the proposed settlement be given to the Class; (7) appointing
11 ILYM Group as the Administrator; and (8) scheduling a final approval hearing date
12 proposed for December 12, 2023 to consider Plaintiff’s motion for final approval of the
13 settlement and entry of the Judgment, and Plaintiff’s motion for approval of attorneys’ fees
14 and expenses.

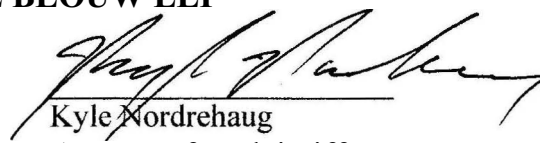
15 This motion for preliminary approval of the class settlement is brought pursuant to
16 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of
17 motion and motion, the accompanying memorandum of points and authorities, the
18 Declaration of Kyle Nordrehaug, the Declaration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

22 Respectfully submitted,

23 Dated: July 6, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

24
25 By


26 Kyle Nordrehaug
27 Attorney for Plaintiff
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