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

Hearing Date: December 12, 2023

Hearing Time: 8:30 a.m.

[Hearing scheduled by Order dated August 1,
2023]

Judge: Hon. David R. Zulfa

Div.: J

Date Filed: May 10, 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 December 12, 2023 or as soon
3 thereafter as the matter can be heard, in Division J of the above entitled Court before the
4 Honorable David R. Zulfa, Plaintiff Liliana Anderson (“Plaintiff”) will move for an order
5 granting (1) Final Approval of the Class Action Settlement and the Attorneys’ Fees, Costs and
6 Service Award, and (2) Entry of the Final Approval Order and the Judgment.

7 This motion is brought in accordance with the Order dated August 1, 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 and PAGA Settlement Agreement (the “Agreement”), the Declaration of Cassandra Polites (the
11 Administrator), the Declaration of Liliana Anderson, and the complete files and records in this
12 action.

13 Because Plaintiff and Defendants Ramm Hospitality, Inc. and Prime Hospitality Services,
14 LLC (“Defendants”) have agreed to the proposed class settlement and have met and conferred
15 regarding the motion, this motion is not opposed. There have been no objections submitted by
16 the Class.

17 Respectfully submitted,

18 Dated: November 14 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

20 By: /s/ Kyle Nordrehaug
21 Norman B. Blumenthal, Esq.
22 Kyle R. Nordrehaug, Esq.

23 Attorneys for Plaintiff
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