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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN BERNARDINO**

KEELAIN GONZALEZ, on behalf of
himself and on behalf of all persons
similarly situated, and on behalf of the
State of California, as a private attorney
general,

Plaintiff,

vs.

PACIFIC WESTERN BANK, a
California Corporation; DOES 1 through
50, inclusive,

Defendants.

CASE No. **CIVSB2127657**
[Related Case: CIVSB2127696]

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

Hearing Date: January 4, 2023
Hearing Time: 10:00 a.m.

Judge: Hon. David Cohn
Dept.: S26

Action Filed: September 29, 2021
Trial Date: Not Set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on January 4, 2023, or as soon
thereafter as the matter can be heard, in Department 26 at the above entitled Court before the

1 Honorable David Cohn, Plaintiff Keelain Gonzalez (“Plaintiff”) will apply for an order:
2 (1) preliminarily approving the proposed settlement of this class action with Defendant
3 Pacific Western Bank (“Defendant”); (2) for settlement purposes only, conditionally
4 certifying the Class, which is comprised of “all individuals who are or previously were
5 employed by Defendant Pacific Western Bank in California who were classified as hourly,
6 non-exempt employees at any time during the Class Period”, which is from October 1, 2018
7 through November 3, 2022; (3) provisionally appointing Plaintiff as the representative of the
8 Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, and
9 Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel;
10 (5) approving the form and method for providing class-wide notice; (6) directing that notice
11 of the proposed settlement be given to the class; (7) appointing ILYM Group as
12 Administrator, and (8) scheduling a final approval hearing date to consider Plaintiff’s
13 motion for final approval of the settlement and entry of the Judgment, and Plaintiff’s motion
14 for approval of attorneys’ fees and expenses.

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

23 Respectfully submitted,

24 Dated: December 7, 2022

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

25
26 By:



Kyle Nordrehaug
Attorney for Plaintiff