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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

MARIA SEGISMUNDO and DAVID
GRAY, individuals, on behalf of
themselves and on behalf of all persons
similarly situated, and on behalf of the
State of California, as a private attorney
general,

Plaintiffs,

vs.

RANCHO MURIETA COUNTRY
CLUB, a California Corporation; and
DOES 1 through 10, inclusive,

Defendants.

CASE NO.: **34-2021-00308730-CU-OE-GDS**
[consolidated with case no.
34-2021-00308737]

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

Hearing Date: August 16, 2024
Hearing Time: 9:00 a.m.
Reservation ID # **A-308730-002**

Judge: Hon. Jill H. Talley
Dept: 23

Date Filed: September 23, 2021
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on August 16, 2024 in
Department 23 at the above entitled Court before the Honorable Jill H. Talley, Plaintiffs

1 Maria Segismundo and David Gray (“Plaintiffs”) will apply for an order: (1) preliminarily
2 approving the proposed settlement of this class action with Defendant Rancho Murieta
3 Country Club (“Defendant”); (2) for settlement purposes only, conditionally certifying the
4 Class, which is comprised of “all individuals who are or previously were employed by
5 Defendant Rancho Murieta Country Club in the State of California on a non-exempt basis at
6 any time during the Class Period”; (3) provisionally appointing Plaintiffs as the
7 representatives of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R.
8 Nordrehaug, Aparajit Bhowmik and Christine T. LeVu of Blumenthal Nordrehaug Bhowmik
9 De Blouw LLP as Class Counsel; (5) approving the form and method for providing class-
10 wide notice; (6) directing that notice of the proposed settlement be given to the class; (7)
11 appointing Apex Class Action as Administrator, and (8) scheduling a final approval hearing
12 date, proposed for January 10, 2025 which is at least 120 days from preliminary approval, to
13 consider Plaintiffs’ motion for final approval of the settlement and for approval of attorneys’
14 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. Plaintiffs’ 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 Declarations of the Plaintiffs, the Class Action and
19 PAGA Settlement Agreement (“Agreement”) between the Parties, and the complete files and
20 records in this action. Because all Parties have agreed to the proposed class settlement, this
21 motion is not opposed by Defendant.

22 Respectfully submitted,

23 Dated: July 23, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

24 By: /s/ Kyle Nordrehaug
25 Kyle R. Nordrehaug, Esq.
26 Attorney for Plaintiffs
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