

BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW, LLP
Norman B. Blumenthal (SBN 068687)
Kyle R. Nordrehaug (SBN 205975)
Aparajit Bhowmik (SBN 248066)
Jeffrey S. Herman (SBN 280058)
2255 Calle Clara
La Jolla, CA 92037
Tel: 858.551.1223 | Fax: 858.551.1232
*Attorneys for Plaintiffs Angel Zamora, Gabriel Loaiza,
Jorge Guillen and Mark Luna*

(Additional counsel on the following page)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

ERIC D. MCDOWELL, an individual; AARON
L. STUBBS, an individual; LEON C. WILLIS,
and individual, and on behalf of all persons
similarly situated,

Plaintiffs,

v.

PENSKE TRUCK LEASING CO., L.P.; and
DOES 1 through 10 inclusive,

Defendants.

LADELL TAYLOR, as an individual, on behalf
of himself and all persons similarly situated,
Plaintiff,

v.

PENSKE LOGISTICS, LLC, a Delaware limited
liability company authorized to do business in
California; PENSKE TRUCK LEASING CO.,
L.P., a Delaware limited partnership authorized
to do business in California; and DOES 1
through 50 inclusive,

Defendants.

ANGEL ZAMORA, GABRIEL LOAIZA and
JORGE GUILLEN, individuals, on behalf of
themselves and on behalf of all persons similarly
situated,

Plaintiffs,

vs.

Case No.: CIVDS2012273

[Assigned for all purposes to the Hon. David Cohn,
Dept. S-26]

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

[Hearing scheduled by Order dated April 6, 2022]

Hearing Date: August 29, 2022

Hearing Time: 10:00 a.m.

Judge: Hon. David Cohn

Dept.: S-26

1 PENSKE TRUCK LEASING CO., L.P., a
2 Limited Partnership,

Defendant.

3 MARK LUNA, an individual, on behalf of
4 himself and on behalf of all persons similarly
situated,

Plaintiff,

5 v.

6 PENSKE LOGISTICS LLC, a Limited Liability
7 Company; and DOES 1 through 50, Inclusive,
Defendants.

8 PHIL POSTON, individually, and on behalf of
9 other members of the general public similarly
situated;

Plaintiff,

10 vs.

11 PENSKE LOGISTICS, LLC, an unknown
12 business entity; PENSKE TRUCK LEASING
CO., L.P., an unknown business entity; and
13 DOES 1 through 100, inclusive,
Defendants.

14 **Additional Counsel:**

15 GRAHAMHOLLIS, APC
16 Graham S.P. Hollis (SBN 120577)
ghollis@grahamhollis.com
17 Vilmarie Cordero (SBN 268860)
vcordero@grahamhollis.com
18 Hali M. Anderson (SBN 261816)
handerson@grahamhollis.com
19 Dawn M. Berry (SBN 292335)
dberry@grahamhollis.com
20 3555 Fifth Avenue, Suite 200
San Diego, California 92103
21 Tel.: 619.692.0800 | Fax: 619.692.0822
Attorneys for Plaintiff Ladell Taylor

22 Edwin Aiwarzian (SBN 232943)
23 Charles T. Sweeny (SBN 325167)
LAWYERS for JUSTICE, PC
24 410 West Arden Avenue, Suite 203
Glendale, CA 92103
25 Tel.: (818) 265-1020 | Fax: (818) 265-1021
Attorneys for Phil Poston

SKAPIK LAW GROUP
Mark Skapik (SBN 164957)
Geraldyn Skapik (SBN 145055)
Blair J. Berkley (SBN 222293)
5861 Pine Ave. Suite A-1
Chino Hills, CA 91709
Tel.: (909) 398-4404 | Fax: (909) 398-1883
*Attorneys for Plaintiffs Eric D. McDowell, Aaron
L. Stubbs, and Leon C. Willis*

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

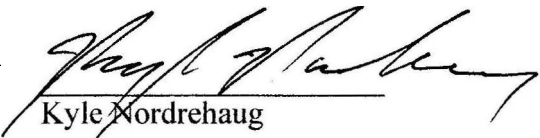
2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on August 29, 2022, or as soon thereafter
3 as the matter can be heard, in Department S-26 of the above-entitled Court before the Honorable David
4 Cohn, Plaintiffs Angel Zamora, Gabriel Loaiza, Jorge Guillen, Mark Luna, Phil Poston, Eric D.
5 Mcdowell, Aaron L. Stubbs, Leon C. Wills, and Ladell Taylor (“Plaintiffs”) will move for an order
6 granting (1) Final Approval of the Class Action Settlement, and (2) Entry of the Final Approval Order
7 and Judgment.

8 This Motion is brought in accordance with the Order dated April 6, 2022 , and California Rules
9 of Court, rule 3.769. This Motion will be based on this Notice, the accompanying Memorandum of
10 Points and Authorities, the Declaration of Norman Blumenthal, the Declaration of Graham S.P. Hollis,
11 the Declaration of Edwin Aiwazian, the Declaration of Geralyn L. Skapik, the Declaration of Mary
12 Butler from Simpluris (the Settlement Administrator), the Declarations of Plaintiffs Angel Zamora,
13 Gabriel Loaiza, Jorge Guillen, Mark Luna, Phil Poston, Eric D. Mcdowell, Aaron L. Stubbs, Leon C.
14 Wills, and Ladell Taylor, the Class Action Settlement Agreements (the “Agreements”), and the complete
15 files and records in this action.

16 Because Plaintiffs and Defendants Penske Truck Leasing Co., L.P and Penske Logistics LLC
17 (“Defendants”) have agreed to the proposed class settlement and have met and conferred regarding the
18 motion, this motion is not opposed. There have been no objections submitted by the Class.

19
20 Dated: August 4, 2022

Respectfully submitted,
BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP

21
22
23 By: 

Kyle Nordrehaug

24 Attorney for Plaintiffs Angel Zamora, Gabriel Loaiza,
25 Jorge Guillen and Mark Luna
26
27
28