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

15 AL-JERONE GREEN, TIFFANY
16 MANJARES and DOANYA PUCCINI,
17 individuals, on behalf of themselves and
18 on behalf of all persons similarly
19 situated,

20 Plaintiff,

21 vs.

22 FIVE KEYS SCHOOLS AND
23 PROGRAMS, a California Corporation,
24 and DOES 1 through 50, inclusive,

25 Defendants.

26 AL-JERONE GREEN, TIFFANY
27 MANJARES and DOANYA PUCCINI, on
28 behalf of the State of California, as private
attorney generals

Plaintiff,

vs.

FIVE KEYS SCHOOLS AND
PROGRAMS, a California Corporation,
and DOES 1 through 50, inclusive,
Defendants.

Case No. CGC-21-596165

(Consolidated with Case No. CGC-21-596167)

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

Hearing Date: March 29, 2023

Hearing Time: 9:30 a.m.

Judge: Hon. Richard B. Ulmer

Dept: 302

Action Filed: October 20, 2021

Trial Date: Not Set

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

2 YOU ARE HEREBY NOTIFIED THAT on March 29, 2023 at 9:30 a.m., in
3 Department 302 of the above entitled Court before the Honorable Richard B. Ulmer,
4 Plaintiffs Al-Jerone Green, Tiffany Manjares, and Doanya Puccini (“Plaintiffs”) will apply
5 for an order: (1) preliminarily approving the proposed settlement of this class action with
6 Defendant Five Keys Schools and Programs (“Defendant”); (2) for settlement purposes only,
7 conditionally certifying the Class, which is comprised of “all individuals who are or
8 previously were employed by Defendant in California who were classified as hourly,
9 non-exempt employees at any time during the Class Period” of October 20, 2017 through
10 August 11, 2022; (3) provisionally appointing Plaintiffs as the representatives of the Class;
11 (4) provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit
12 Bhowmik, Jeffrey S. Herman, and Sergio J. Puche of Blumenthal Nordrehaug Bhowmik De
13 Blouw LLP as Class Counsel for the Class; (5) approving the form and method for providing
14 class-wide notice; (6) directing that notice of the proposed settlement be given to the class;
15 (7) appointing ILYM Group as Settlement Administrator, and (8) scheduling a final
16 approval hearing date to consider Plaintiffs’ motion for final approval of the settlement and
17 entry of the Judgment, and Plaintiffs’ motion for approval of attorneys' fees and expenses.

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

24 Respectfully submitted,

25 Dated: February 28, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

26
27 By: /s/ Kyle Nordrehaug
Norman B. Blumenthal, Esq.
Kyle R. Nordrehaug, Esq.
28 Attorney for Plaintiffs