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Attorneys for Plaintiffs

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

SIERRA STEELE and ELIJAH
WILKINSON, on behalf of the State of
California, as private attorneys general,
and as individuals, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiff,

vs.

LEGOLAND CALIFORNIA, LLC, a
Limited Liability Company; and DOES 1
through 50, inclusive,

Defendants.

Case No. 37-2021-00052868-CU-OE-CTL

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

Hearing Date: June 30, 2023

Hearing Time: 10:30 a.m.

Judge: Hon. Carolyn M. Caietti
Dept: 70

Action Filed: December 17, 2021

Trial Date: Not Set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on June 30, 2023 at 10:30 a.m., in
Department 70 of the above entitled Court before the Honorable Carolyn M. Caietti,
Plaintiffs Sierra Steele and Elijah Wilkinson ("Plaintiffs") will apply for an order:
(1) preliminarily approving the proposed settlement of this class action with Defendant

1 LEGOLAND California, LLC (“Defendant”); (2) for settlement purposes only, conditionally
2 certifying the Class, which is comprised of “all individuals employed by Defendant in the
3 State of California in a non-exempt position during the Class Period” of December 17, 2017
4 through and including February 12, 2023 (excluding certain individuals who signed a
5 severance agreement during the Class Period and were not subsequently rehired by
6 Defendant); (3) provisionally appointing Plaintiffs as the representatives of the Class; (4)
7 provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug and Aparajit
8 Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the
9 Class; (5) approving the form and method for providing class-wide notice; (6) directing that
10 notice of the proposed settlement be given to the Class; (7) appointing ILYM Group as
11 Administrator, and (8) scheduling a final approval hearing date in approximately four
12 months to consider Plaintiffs’ motion for final approval of the settlement and entry of the
13 Judgment, and Plaintiffs’ motion for approval of attorneys' fees and expenses.

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

21 Respectfully submitted,

22 Dated: June 6, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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