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

15 ALMA HEYMAN, an individual, on
16 behalf of himself and on behalf of all
17 persons similarly situated,

18 Plaintiff,

19 vs.

20 RENOIR HM, LLC, a Limited Liability
21 Company; and Does 1 through 50,
22 Inclusive,

23 Defendants.

Case No. CGC-21-595913

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

Hearing Date: June 1, 2023

Hearing Time: 9:30 a.m.

Judge: Hon. Richard B. Ulmer
Dept: 302

Date Filed: October 8, 2021

Trial Date: Not set

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

25 YOU ARE HEREBY NOTIFIED THAT on June 1, 2023 at 9:30 a.m., in Department
26 302 of the above entitled Court before the Honorable Richard B. Ulmer, Plaintiff Alma
27

1 Heyman (“Plaintiff”) will apply for an order: (1) preliminarily approving the proposed
2 settlement of this class action with Defendant Renoir HM, LLC (“Defendant”); (2) for
3 settlement purposes only, conditionally certifying the Class, which is comprised of “all
4 individuals who were employed by Defendant in California and classified as hourly,
5 non-exempt employees at any time during the Class Period” of December 1, 2018 through
6 December 31, 2022; (3) provisionally appointing Plaintiff as the representative of the Class;
7 (4) 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 Phoenix Class Action
11 Administration Solutions as the Administrator; and (8) scheduling a final approval hearing
12 for the proposed date of October 5, 2023 to consider Plaintiff’s motion for final approval of
13 the settlement and entry of the Judgment, and Plaintiff’s motion for approval of attorneys’
14 fees and expenses.

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

22 Respectfully submitted,

23 Dated: May 8, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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