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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF STANISLAUS

RACHEL V. CORREIA, an individual;
and on behalf of all others similarly
situated and aggrieved; REBEKAH
MEDINA, an individual; and on behalf of
all others similarly situated and aggrieved;
CARLOS COUSINEAU, an individual;
and on behalf of all others similarly
situated and aggrieved; DANIEL
GARCIA, an individual; and on behalf of
all others similarly situated and aggrieved,
Plaintiff,

vs.

GALLO GLASS COMPANY, a Nevada
corporation; NIGEL DART, an
individual; and DOES 1 through 100,
inclusive,
Defendants.

Case No. CV-21-006459

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

Hearing Date: September 1, 2023

Hearing Time: 8:30 a.m.

*[Hearing scheduled by Order dated April 14,
2023 at paragraph 12]*

Judge: Hon. Sonny S. Sandhu
Dept.: 24

Action Filed: December 1, 2021

Trial Date: Not Set

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on September 1, 2023 or as soon
3 thereafter as the matter can be heard, in Department 24 of the above-entitled Court before the
4 Honorable Sonny S. Sandhu, Plaintiffs Rachel Correia, Rebekah Medina, Carlos Cousineau, and
5 Daniel Garcia (“Plaintiffs”) will move for an order granting (1) Final Approval of the Class
6 Action Settlement, and (2) Entry of the Final Approval Order and Judgment.

7 This motion is brought in accordance with the Orders dated April 14, 2023, and
8 California Rules of Court, rule 3.769. This Motion will be based on this notice, the
9 accompanying points and authorities, the Declaration of Norman Blumenthal, the Declaration
10 of David Bibiyan, the Declaration of Kevin Lee (the Settlement Administrator), the Declarations
11 of Plaintiffs Rachel Correia, Rebekah Medina, Carlos Cousineau, and Daniel Garcia, the Class
12 Action and PAGA Action Settlement Agreement (the “Agreement”), and the complete files and
13 records in this action.

14 Because Plaintiffs and Defendants Gallo Glass Company and Nigel Dart (“Defendants”)
15 have agreed to the proposed class settlement and have met and conferred regarding the motion,
16 this motion is not opposed. There have been no objections submitted by the Class.

17 Respectfully submitted,

18 Dated: August 8, 2023

19 **BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

20 By: /s/ Kyle Nordrehaug
21 Norman B. Blumenthal
22 Kyle R. Nordrehaug
23 Attorney for Plaintiffs
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