

**BLUMENTHAL NORDREHAUG BHOWMIK  
DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)  
Kyle R. Nordrehaug (State Bar #205975)  
Aparajit Bhowmik (State Bar #248066)  
2255 Calle Clara  
La Jolla, CA 92037  
Telephone: (858)551-1223  
Facsimile: (858) 551-1232  
Email: [Kyle@bamlawca.com](mailto:Kyle@bamlawca.com)  
Website: [www.bamlawca.com](http://www.bamlawca.com)

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF ORANGE**

KACEY MATTHEWS, an individual, on  
behalf of herself and on behalf of all  
persons similarly situated,

Plaintiffs,

vs.

DEJON ENTERPRISES, INC., a  
California Corporation; and DOES 1  
through 50, inclusive,

Defendants.

CASE NO.: 30-2021-01236088-CU-OE-CXC

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

Hearing Date: December 15, 2023  
Hearing Time: 9:00 a.m.  
**Reservation No. 74146786**

Judge: Hon. William D. Claster  
Dept.: CX101

Action Filed: December 14, 2021  
Trial Date: Not set

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

YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on December 15, 2023, or as  
soon thereafter as the matter can be heard, in Department CX101 at the above entitled Court

1 before the Honorable William D. Claster, Plaintiff Kacey Matthews (“Plaintiff”) will apply  
2 for an order: (1) preliminarily approving the proposed settlement of this class action with  
3 Defendant Dejon Enterprises, Inc. (“Defendant”); (2) for settlement purposes only,  
4 conditionally certifying the Class, which is comprised of “all individuals who are or  
5 previously were employed by Defendant Dejon Enterprises, Inc. in California who were  
6 classified as hourly, non-exempt employees at any time during the Class Period” which is  
7 December 14, 2017 to December 11, 2022; (3) provisionally appointing Plaintiff as the  
8 representative of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R.  
9 Nordrehaug, and Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP  
10 as Class Counsel; (5) approving the form and method for providing class-wide notice;  
11 (6) directing that notice of the proposed settlement be given to the class; (7) appointing  
12 ILYM Group as Administrator, and (8) scheduling a final approval hearing date to consider  
13 Plaintiff’s motion for final approval of the settlement and for approval of attorneys' fees and  
14 expenses.

15 This unopposed motion for preliminary approval of the class settlement is brought  
16 pursuant to California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this  
17 notice of 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: November 13, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK  
DE BLOUW LLP**

24 By: /s/ Kyle Nordrehaug  
25 Kyle R. Nordrehaug, Esq.  
26 Attorney for Plaintiff  
27  
28