

**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

Website: www.bamlawca.com

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

EDWARD VIRGEN III, HOLLY
ALSOP, and CHRISTOPHER SHEA
O'DONNELL, on behalf of the State of
California, as private attorney generals,
and as individuals, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

CURALEAF CA, INC., a California
Corporation; CURA CA LLC, a
California Limited Liability Company;
CURA CS INC., a Corporation; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **34-2022-00314655-CU-OE-GDS**

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

Hearing Date: April 26, 2024

Hearing Time: 9:00 a.m.

Reservation # **A-314655-001**

Judge: Hon. Lauri A. Damrell

Dept: 22

Date Filed: January 31, 2022

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 April 26, 2024 in
Department 3 at the above entitled Court before the Honorable Lauri A. Damrell, Plaintiffs
Holly Alsop, Christopher Shea O'Donnell, and Edward Virgen III ("Plaintiffs") will apply

1 for an order: (1) preliminarily approving the proposed settlement of this class action with
2 Defendants Curaleaf CA, Inc., Cura CA LLC, and Cura CS Inc. (“Defendants”); (2) for
3 settlement purposes only, conditionally certifying the Class, which is comprised of “all
4 individuals who are or previously were employed by Defendants Curaleaf CA, Inc., Cura
5 CA LLC, and Cura CS Inc. in the State of California on a non-exempt basis at any time
6 during the Class Period”, which is January 27, 2018 through November 16, 2023; (3)
7 provisionally appointing Plaintiffs as the representatives of the Class; (4) provisionally
8 appointing Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik, Nicholas J. De
9 Blouw and Christine T. LeVu of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class
10 Counsel; (5) approving the form and method for providing class-wide notice; (6) directing
11 that notice of the proposed settlement be given to the class; (7) appointing ILYM Group as
12 Administrator, and (8) scheduling a final approval hearing date, proposed for September 13,
13 2024 which is at least 120 days from preliminary approval, to consider Plaintiffs’ motion for
14 final approval of the settlement and for approval of attorneys’ fees and expenses.

15 This unopposed motion for preliminary approval of the class settlement is brought
16 pursuant to California Rules of Court, rule 3.769. Plaintiffs’ 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 Declarations of the Plaintiffs, the Class Action and
19 PAGA Settlement Agreement (“Agreement”) between the Parties, and the complete files and
20 records in this action. Because all Parties have agreed to the proposed class settlement, this
21 motion is not opposed by Defendants.

22 Respectfully submitted,

23 Dated: April 4, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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