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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

LOLA MARCUM and JOSE G.
IRIZARRY, 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,

Plaintiffs,

vs.

HUNTSMAN ADVANCED
MATERIALS AMERICAS LLC, a
Limited Liability Company; HUNTSMAN
INTERNATIONAL LLC, a Limited
Liability Company; and DOES 1 through
50, inclusive,

Defendants.

CASE NO.: 22STCV03845

**NOTICE OF MOTION AND MOTION FOR
FINAL APPROVAL OF CLASS
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS AND
SERVICE AWARDS**

Hearing Date: August 2, 2204

Hearing Time: 10:30 a.m.

[Hearing scheduled by Order dated February 2,
2024]

Judge: Hon. Stuart M. Rice
Dept.: SS-1

Action Filed: January 31, 2022

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on August 2, 2024, or as soon
3 thereafter as the matter can be heard, in Department SS-1 at the above entitled Court before the
4 Honorable Stuart M. Rice, Plaintiffs Lola Marcum and Jose G. Irizarry (“Plaintiffs”) will move
5 for an order granting (1) Final Approval of the Class Action Settlement and Award of
6 Attorneys’ Fees Costs and Service Awards, and (2) Entry of the Final Approval Order and the
7 Judgment.

8 This motion is brought in accordance with the Order dated February 2, 2024, and
9 California Rules of Court, rule 3.769. This Motion will be based on this notice, the
10 accompanying points and authorities, the Declaration of Norman Blumenthal, the Declaration
11 of Eve Howe, the Class Action and PAGA Settlement Agreement (the “Agreement”), the
12 Declaration of Nicole Bench (the Administrator), the Declarations of the Plaintiffs, and the
13 complete files and records in this action.

14 Because Plaintiffs and Defendants Huntsman International LLC and Huntsman Advanced
15 Materials Americas LLC (“Defendants”) have agreed to the proposed class settlement and have
16 met and conferred regarding the motion, this motion is not opposed. There have been no
17 objections submitted by the Class.

18 Respectfully submitted,

19 Dated: July 11, 2024

20 **BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

21 By: /s/ Kyle Nordrehaug
22 Norman B. Blumenthal, Esq.
23 Kyle R. Nordrehaug, Esq.

24 Attorneys for Plaintiffs
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