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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,

Plaintiff,

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

[Consolidated with Case No. 22STCV22712]

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

Hearing Date: February 2, 2024
Hearing Time: 10:30 a.m.

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

Date 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 on February 2, 2024 at 10:30 a.m., in
3 Department 1 in the Spring Street Courthouse of the above entitled Court before the
4 Honorable Stuart M. Rice, Plaintiffs Lola Marcum and Jose G. Irizarry (“Plaintiffs”) will
5 move for an order: (1) preliminarily approving the proposed settlement of this class action
6 with Defendants Huntsman International LLC and Huntsman Advanced Materials Americas
7 LLC (“Defendants”); (2) for settlement purposes only, conditionally certifying the Class,
8 which is comprised of “all individuals who were employed by Defendants Huntsman
9 International LLC and Huntsman Advanced Materials Americas LLC in California and
10 classified as an hourly non-exempt employee at any time during the Class Period”, which is
11 January 31, 2018 through February 17, 2023; (3) provisionally appointing Plaintiffs as the
12 representatives of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R.
13 Nordrehaug, and Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP
14 and Joseph Lavi and Vincent Granberry of Lavi & Ebrahimian, LLP as Class Counsel for
15 the Class; (5) approving the form and method for providing notice to the Class of the
16 proposed settlement; (6) directing that notice of the proposed settlement be given to the
17 Class; (7) appointing ILYM Group, Inc. as the Administrator; and (8) scheduling a final
18 approval hearing date in approximately four months to consider the Plaintiffs’ motion for
19 final approval of the settlement and for approval of attorneys’ fees, expenses and the service
20 awards.

21 This motion for preliminary approval of the class settlement is brought pursuant to
22 California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this notice of
23 motion and motion, the accompanying memorandum of points and authorities, the
24 Declaration of Kyle Nordrehaug, the Declaration of Vincent Granberry, the Declaration of
25 Lola Marcum, the Declaration of Jose G. Irizarry, the Class Action and PAGA Settlement
26 Agreement (the “Agreement”) between the parties, and the complete files and records in this
27 action. Because all Parties have agreed to the proposed class settlement, this joint motion is
28

1 unopposed.

2 Respectfully submitted,

3 Dated: January 9, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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

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