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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **IN AND FOR THE COUNTY OF SANTA CLARA**

15 KENNETH NGUYEN, on behalf of the
16 State of California, as a private attorney
17 general, and as an individual, on behalf of
18 himself and on behalf of all persons
19 similarly situated,

20 Plaintiffs,

21 vs.

22 PORT PLASTICS, INC., a California
23 Corporation; and DOES 1 through 50,
24 inclusive,

25 Defendants.

CASE NO.: 22CV394401

[Consolidated with Case No. 22CV394403]

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

Hearing Date: September 25, 2024

Hearing Time: 1:30 p.m.

[Hearing scheduled by Order dated June 11,
2024]

Judge: Hon. Theodore C. Zayner

Dept.: 19

Action Filed: February 15, 2022

Trial Date: Not set

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

27 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on September 25, 2024, or as soon
28 thereafter as the matter can be heard, in Department 19 at the above entitled Court before the
Honorable Theodore C. Zayner, Plaintiff Kenneth Nguyen ("Plaintiff") will move for an order

1 granting (1) Final Approval of the Class Action Settlement and Award of Attorneys' Fees Costs
2 and Service Award, and (2) Entry of the Final Approval Order and the Judgment.

3 This motion is brought in accordance with the Order dated June 11, 2024, and California
4 Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points
5 and authorities, the Declaration of Norman Blumenthal, the Class Action and PAGA Settlement
6 Agreement (the "Agreement"), the Declaration of Makenna Snow (the Administrator), the
7 Declaration of the Plaintiff, and the complete files and records in this action.

8 Because Plaintiff and Defendant Port Plastics, Inc. have agreed to the proposed class
9 settlement and have met and conferred regarding the motion, this motion is not opposed. There
10 have been no objections submitted by the Class.

11 Respectfully submitted,

12 Dated: August 30, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

14 By: /s/ Kyle Nordrehaug
15 Norman B. Blumenthal, Esq.
16 Kyle R. Nordrehaug, Esq.

Attorneys for Plaintiff