

1 **BLUMENTHAL NORDREHAUG BHOWMIK**
2 **DE BLOUW LLP**

3 Norman B. Blumenthal (State Bar #068687)

4 Kyle R. Nordrehaug (State Bar #205975)

5 Aparajit Bhowmik (State Bar #248066)

6 2255 Calle Clara

7 La Jolla, CA 92037

8 Telephone: (858)551-1223

9 Facsimile: (858)551-1232

10 Email: Kyle@bamlawca.com

11 Website: www.bamlawca.com

12 Attorneys for Plaintiffs

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

14 **IN AND FOR THE COUNTY OF SACRAMENTO**

15 NINA MCPHERSON and DOREEN
16 HUPP, individuals, on behalf of
17 themselves and on behalf of all persons
18 similarly situated,

19 Plaintiffs,

20 vs.

21 GENERAL LOGISTICS SYSTEMS US,
22 INC., a California Corporation; and
23 DOES 1 through 50, inclusive,

24 Defendants.

CASE NO.: **34-2022-00318236-CU-OE-GDS**
[consolidated with Case No.
34-2022-00318125]

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

Hearing Date: March 28, 2025
Hearing Time: 9:00 a.m.
Reservation ID # **A-318236-001**

Judge: Hon. Jill H. Talley
Dept: 23

Date Filed: April 13, 2022
Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on March 28, 2025 in
3 Department 23 at the above entitled Court before the Honorable Jill H. Talley, Plaintiffs
4 Nina McPherson and Doreen Hupp (“Plaintiffs”) will apply for an order: (1) preliminarily
5 approving the proposed settlement of this class action with Defendant General Logistics
6 Systems US, Inc. (“Defendant”); (2) for settlement purposes only, conditionally certifying
7 the Class, which is comprised of “all individuals who are or previously were employed by
8 Defendant who were classified as non-exempt and all individuals who are or previously
9 were employed by Defendant who were classified as Inside Sales Employees in the State of
10 California at any time during the Class Period, excluding drivers”; (3) provisionally
11 appointing Plaintiffs as the representatives of the Class; (4) provisionally appointing
12 Norman B. Blumenthal, Kyle R. Nordrehaug, and Aparajit Bhowmik of Blumenthal
13 Nordrehaug Bhowmik De Blouw LLP as Class Counsel; (5) approving the form and method
14 for providing class-wide notice; (6) directing that notice of the proposed settlement be given
15 to the class; (7) appointing ILYM Group, Inc. as Administrator, and (8) scheduling a final
16 approval hearing date, proposed for August 15, 2025 which is at least 120 days from
17 preliminary approval, to consider Plaintiff’s motion for final approval of the settlement and
18 for approval of attorneys’ fees and expenses.

19 This unopposed motion for preliminary approval of the class settlement is brought
20 pursuant to California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this
21 notice of motion and motion, the accompanying memorandum of points and authorities, the
22 Declaration of Kyle Nordrehaug, the Declarations of the Plaintiffs, the Class Action and
23 PAGA Settlement Agreement (“Agreement”) between the Parties, and the complete files and
24 records in this action. Because all Parties have agreed to the proposed class settlement, this
25 motion is not opposed by Defendant.

26 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits
27 of this matter by 2:00 p.m., the court day before the hearing. The complete text of the
28 tentative ruling may be downloaded off the court's website. If the party does not have online

1 access, they may call the dedicated phone number for the department as referenced in the
2 local telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day
3 before the hearing and receive the tentative ruling. If you do not call the court and the
4 opposing party by 4:00 p.m. the court day before the hearing, no hearing will be held.

5 Respectfully submitted,

6 Dated: March 4, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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