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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

FRANCIS COQUILLETTE, an
individual, on behalf of himself and on
behalf of all persons similarly situated,
and on behalf of the State of California, as
a private attorney general,

Plaintiffs,

vs.

LOCATION SERVICES, LLC, a Limited
Liability Company; and DOES 1 through
50, inclusive,

Defendants.

CASE NO.: **37-2022-00019868-CU-OE-CTL**

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

Hearing Date: August 23, 2024

Hearing Time: 1:30 p.m.

Judge: Hon. Katherine Bacal
Dept.: 69

Date Action Filed: May 25, 2022

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on August 23, 2024 in
Department 69 at the above entitled Court before the Honorable Katherine Bacal, Plaintiff

1 Francis Coquillet ("Plaintiff") will apply for an order: (1) preliminarily approving the
2 proposed settlement of this class action with Defendant Location Services, Inc.
3 ("Defendant"); (2) for settlement purposes only, conditionally certifying the Class, which is
4 comprised of "individuals who are or previously were employed by Defendant in the State of
5 California on a non-exempt basis at any time during the Class Period (March 25, 2018
6 through November 25, 2023)"; (3) provisionally appointing Plaintiff as the representative of
7 the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit
8 Bhowmik, and Christine T. LeVu of Blumenthal Nordrehaug Bhowmik De Blouw LLP as
9 Class Counsel; (5) approving the form and method for providing class-wide notice;
10 (6) directing that notice of the proposed settlement be given to the Class; (7) appointing
11 Apex Class Action as Administrator, and (8) scheduling a final approval hearing date,
12 proposed for January 17, 2025 to consider Plaintiff's motion for final approval of the
13 settlement and for approval of attorneys' fees and expenses.

14 This unopposed motion for preliminary approval of the class settlement is brought
15 pursuant to California Rules of Court, rule 3.769. Plaintiff's motion will be based on this
16 notice of motion and motion, the accompanying memorandum of points and authorities, the
17 Declaration of Kyle Nordrehaug, the Declaration of the Plaintiff, the Class Action and
18 PAGA Settlement Agreement ("Agreement") between the Parties, and the complete files and
19 records in this action. Because all Parties have agreed to the proposed class settlement, this
20 motion is not opposed by Defendant.

21 Respectfully submitted,

22 Dated: August 1, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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