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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

FELIX GUNAWAN, TAJE FLEMING,
TOMA STAVREV, SAIF AHMED,
IRWANDIE TIO, and XAVIER
BROWN, individuals, on behalf of
themselves and on behalf of all persons
similarly situated and on behalf of the
State of California, as a private attorney
General,

Plaintiffs,

vs.

TRANSDEV ALTERNATIVE
SERVICES, INC., a Corporation; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **CGC-22-599234**

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

Hearing Date: December 16, 2025

Hearing Time: 9:00 a.m.

Judge: Hon. Joseph M. Quinn
Dept.: 302

Date Action Filed: April 19, 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 December 16, 2025 in
3 Department 302 at the above entitled Court before the Honorable Joseph M. Quinn,
4 Plaintiffs Irwandie Tio, Xavier Brown, Felix Gunawan, Taje Fleming, Toma Stavrev, and
5 Saif Ahmed (“Plaintiffs”) will apply for an order: (1) preliminarily approving the proposed
6 settlement of this class action with Defendant Transdev Alternative Services, Inc.
7 (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class, which is
8 comprised of “all individuals who are or were previously employed by Defendant in
9 California and classified as a non-exempt employee and worked at least a day at any time
10 during the Class Period”, which is November 21, 2019 to January 24, 2025; (3)
11 provisionally appointing Plaintiffs as the representatives of the Class; (4) provisionally
12 appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP and Lawyers for Justice, P.C.
13 as Class Counsel; (5) approving the form and method for providing class-wide notice;
14 (6) directing that notice of the proposed settlement be given to the Class; (7) appointing
15 ILYM Group, Inc. as Administrator, and (8) scheduling a final approval hearing date,
16 proposed for May 12, 2026, to consider Plaintiffs’ motion for final approval of the
17 settlement and for approval of attorneys’ fees, expenses and the service awards.

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

25 Respectfully submitted,

26 Dated: November 11, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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