

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

2255 Calle Clara

La Jolla, CA 92037

Telephone: (858)551-1223

Facsimile: (858) 551-1232

Email: Kyle@bamlawca.com

Website: www.bamlawca.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

MAURICIO VIDES, an individual, on
behalf of himself and on behalf of all
persons similarly situated,

Plaintiff,

vs.

ALEXANDER'S STEAKHOUSE, INC., a
California Corporation; and DOES 1
through 50, inclusive,

Defendants.

Case No. 22CV399448

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

Hearing Date: July 11, 2024
Hearing Time: 1:30 p.m.

Judge: Hon. Charles F. Adams
Dept: 7

Date Filed: June 24, 2022
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on July 11, 2024 at 1:30 p.m., in
Department 7 of the above entitled Court before the Honorable Charles F. Adams, Plaintiff
Mauricio Vides ("Plaintiff") will move for an order: (1) preliminarily approving the

1 proposed settlement of this class action with Defendant Alexander's Steakhouse, Inc.
2 (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class, which is
3 comprised of “all individuals who were employed by Defendant in California and classified
4 as a non-exempt employee at any time during the Class Period”, which is June 24, 2018
5 through November 18, 2023; (3) provisionally appointing Plaintiff as the representatives of
6 the Class; (4) provisionally appointing orman B. Blumenthal, Kyle R. Nordrehaug, Aparajit
7 Bhowmik, Nicholas J. De Blouw, Jeffrey S. Herman, Sergio J Puche, and Trevor G. Moran
8 of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the Class; (5)
9 approving the form and method for providing notice to the Class of the proposed settlement;
10 (6) directing that notice of the proposed settlement be given to the Class; (7) appointing
11 ILYM Group as the Administrator; and (8) scheduling a final approval hearing date for
12 December 5, 2024 to consider the Plaintiff’s motion for final approval of the settlement and
13 for approval of attorneys’ fees, expenses and the service award.

14 This motion for preliminary approval of the class settlement is brought pursuant to
15 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of
16 motion and motion, the accompanying memorandum of points and authorities, the
17 Declaration of Kyle Nordrehaug, the Declaration of Plaintiff Mauricio Vides, the Class
18 Action and PAGA Settlement Agreement (the “Agreement”) between the parties, and the
19 complete files and records in this action. Because all Parties have agreed to the proposed
20 class settlement, this motion is unopposed.

21 Respectfully submitted,

22 Dated: June 13, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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