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SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF RIVERSIDE

DONALD MATHEWS, an individual, on
behalf of himself and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

HANSEN & ADKINS AUTO
TRANSPORT, INC., a California
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

CASE No. **CVRI2203075**
[Consolidated with CVRI2203224]

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

Hearing Date: November 14, 2023
Hearing Time: 8:30 a.m.
[Hearing set by Order dated Sept 26, 2023]

Judge: Hon. Harold W. Hopp
Dept: 1

Action Filed: July 21, 2022
Trial Date: Not Set

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on November 14, 2023, or as soon
3 thereafter as the matter can be heard, in Department 1 at the above entitled Court before the
4 Honorable Harold W. Hopp, Plaintiff Donald Mathews ("Plaintiff") will apply for an order:
5 (1) preliminarily approving the proposed settlement of this class action with Defendant Hansen &
6 Adkins Auto Transport, Inc. ("Defendant"); (2) for settlement purposes only, conditionally
7 certifying the following Class: "all individuals who are or previously worked for Defendant in
8 California who were classified as non-exempt at any time during the Class Period", which is July
9 21, 2018 to September 8, 2023.; (3) provisionally appointing Plaintiff as the representative of the
10 Class; (4) provisionally appointing Norman B. Blumenthal, Kyle Nordrehaug, and Aparajit
11 Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the Class; (5)
12 approving the form and method for providing class-wide notice; (6) directing that notice of the
13 proposed settlement be given to the class; (7) appointing ILYM Group as Administrator, and
14 (8) scheduling a final approval hearing for the proposed date of April 2, 2024 to consider Plaintiff's
15 motion for final approval of the settlement and entry of the Judgment, and Plaintiff's motion for
16 approval of attorneys' fees and litigation expenses.

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

23 Respectfully submitted,

24 Dated: October 18, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

25 By: /s/ Kyle Nordrehaug
26 Norman B. Blumenthal, Esq.
27 Kyle R. Nordrehaug, Esq.
28 Attorney for Plaintiff