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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES**

REBEKAH DIAZ, RANDI
STENSBERG, RAFAEL URIBE, and
VIRGINIA ZEBLEY, individuals, on
behalf of themselves and on behalf of all
persons similarly situated,

Plaintiff,

vs.

LOYAL SOURCE GOVERNMENT
SERVICES LLC, a limited liability
company; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 22STCV15413

[consolidated with Case No. 22STCV22205]

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

Hearing Date: October 4, 2023
Hearing Time: 10:30 a.m.

Judge: Hon. Stuart M. Rice
Dept: SS-1

Date Filed: May 10, 2022
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on October 4, 2023 at 10:30 a.m., in
Department 1 in the Spring Street Courthouse of the above entitled Court before the
Honorable Stuart M. Rice, Plaintiffs Rebekah Diaz, Randi Stensberg, Rafael Uribe, and

1 Virginia Zebley (“Plaintiffs”) will move for an order: (1) preliminarily approving the
2 proposed settlement of this class action with Defendant Loyal Source Government Services
3 LLC (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class,
4 which is comprised of “all individuals who are or previously were employed by Defendant
5 in California who were classified as hourly, non-exempt employees at any time during the
6 Class Period, but excluding individuals who: (a) were hired on or before September 29,
7 2020, (b) have not worked for Defendant in California at any time since on or after January
8 29, 2021, and (c) were "Participating Class Members" in the settlement of the consolidated
9 matters of *Ortega, et al. v. Loyal Source Government Services, LLC*, Case No.
10 3:20-cv-00879 and *Ortega v. Loyal Source Government Services, LLC*, Case No.
11 3:20-cv-01173 (the “*Ortega Settlement*”); (3) provisionally appointing Plaintiffs as the
12 representatives of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R.
13 Nordrehaug, and Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP as
14 Class Counsel for the Class; (5) approving the form and method for providing notice to the
15 Class of the proposed settlement; (6) directing that notice of the proposed settlement be
16 given to the Class; (7) appointing ILYM Group, Inc. as the Administrator; and
17 (8) scheduling a final approval hearing date in approximately four months to consider the
18 Plaintiffs’ motion for final approval of the settlement and entry of the Judgment, and
19 Plaintiffs’ motion for approval of attorneys' fees and expenses.

20 This motion for preliminary approval of the class settlement is brought pursuant to
21 California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this notice of
22 motion and motion, the accompanying memorandum of points and authorities, the
23 Declaration of Kyle Nordrehaug, the Class Action and PAGA Settlement Agreement (the
24 “Agreement”) between the parties, and the complete files and records in this action.
25 Because all Parties have agreed to the proposed class settlement, this joint motion is
26 unopposed.

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Respectfully submitted,

Dated: September 7, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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