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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **IN AND FOR THE COUNTY OF PLACER**

15 MONICA CUTHBERT, SHERRI
16 MAYER, BELA CRISPIN, CORRINE
17 SALAZAR-ROSE, individuals, on behalf
18 of themselves and on behalf of all persons
19 similarly situated,

20 Plaintiffs,

21 vs.

22 AMERICAN PACIFIC MORTGAGE
23 CORPORATION, a California
24 Corporation; and DOES 1 through 50,
25 inclusive,

26 Defendants.

CASE No. S-CV-0049369

**NOTICE OF MOTION AND MOTION
FOR FINAL APPROVAL OF CLASS
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS AND
SERVICE AWARDS**

Hearing Date: February 18, 2025

Hearing Time: 8:30 a.m.

*[Hearing scheduled by Orders dated July 23
2024 and November 4, 2024]*

Judge: Hon. Trisha Hirashima

Department: 42

Action Filed: October 27, 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 February 18, 2025 in
3 Department 42 at the above entitled Court before the Honorable Trisha Hirashima, Plaintiffs
4 Monica Cuthbert, Bela Crispin, Sherri Mayer, and Corrine Salazar-Rose (“Plaintiffs”) will move
5 for an order granting (1) Final Approval of the Class Action Settlement, including approval of
6 the attorneys’ fees, costs and service awards, and (2) Entry of the Final Approval Order and the
7 Judgment.

8 This motion is brought in accordance with the Orders dated July 23, 2024 and November
9 4, 2024, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the
10 accompanying points and authorities, the Declaration of Norman Blumenthal, the Class Action
11 and PAGA Settlement Agreement (the “Agreement”), the Declaration of Madely Nava (the
12 Administrator), the Declarations of the Plaintiffs, and the complete files and records in this
13 action.

14 Because Plaintiffs and Defendant American Pacific Mortgage Corporation (“Defendant”)
15 have agreed to the proposed class settlement and have met and conferred regarding the motion,
16 this motion is not opposed. There have been no objections submitted by the Class.

17 “Pursuant to Local Rule 20.2.3, the court will issue a tentative ruling for this matter on
18 the court day before the hearing. The tentative ruling will be available after 12:00 noon on the
19 court’s website, www.placer.courts.ca.gov. The tentative ruling shall become the final ruling
20 on the matter and no hearing will be held unless oral argument is timely requested or the
21 tentative ruling indicates otherwise. Requests for oral argument must be made by calling (916)
22 408-6481 no later than 4:00 p.m. on the court day prior to the hearing.”

23 Respectfully submitted,

24 Dated: January 22, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

26 By: /s/ Kyle Nordrehaug
27 Kyle R. Nordrehaug

28 Attorneys for Plaintiffs