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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA CLARA**

JENNIFER MONTOYA and JUAN
GONTEZ, individually, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

FPR II, L.L.C., dba LEADPOINT
BUSINESS SERVICES, a Limited
Liability Company; and DOES 1 through
50, inclusive,

Defendants.

CASE No. **22CV404499**

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

Hearing Date: April 2, 2025
Hearing Time: 1:30 p.m.
*[Hearing scheduled by Order dated
December 20, 2024]*

Judge: Hon. Theodore C. Zayner
Dept.: 19

Action Filed: October 13, 2022
Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on April 2, 2025, or as soon
3 thereafter as the matter can be heard, in Department 19 of the above entitled Court before the
4 Honorable Theodore C. Zayner, Plaintiffs Jennifer Montoya and Juan Manso Gontez
5 (“Plaintiffs”) will move for an order granting (1) Final Approval of the Class Action Settlement,
6 including approval of the attorneys’ fees, costs and service award, and (2) Entry of the Final
7 Approval Order and the Judgment.

8 This motion is brought in accordance with the Order dated December 20, 2024, and
9 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 Declaration
11 of David Bibiyan, the Joint Stipulation Re: Class Action and Representative Action Settlement
12 (“Settlement,” “Agreement” or “Settlement Agreement”), the Declaration of Cassandra Polites
13 (the Administrator), the Plaintiffs’ Declarations, and the complete files and records in this
14 action.

15 Because Plaintiffs and Defendant FPR II, LLC, dba Leadpoint Business Services
16 (“Defendant”) have agreed to the proposed class settlement and have met and conferred
17 regarding the motion, this motion is not opposed. As of the date of this filing, there have been
18 no objections submitted by the Class.

19 Respectfully submitted,

20 Dated: March 6, 2025

21 **BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

22 By: /s/ Kyle Nordrehaug
23 Kyle R. Nordrehaug, Esq.
24 Attorneys for Plaintiffs
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