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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF NAPA

IGNACIO MORENO, an individual, on
behalf of himself and on behalf of all
persons similarly situated, and on behalf
of the State of California, as a private
attorney general,

Plaintiffs,

vs.

DOMAINE CHANDON, INC., a
Corporation; NEWTON VINEYARD
LLC; and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **22CV001128**

[Consolidated with Case No. 22CV001500]

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

Hearing Date: October 10, 2024

Hearing Time: 8:30 a.m.

Judge: Hon. Cynthia P. Smith

Courtroom: A

Date Action Filed: September 27, 2023

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on October 10, 2024, in
Courtroom A at the above entitled Court before the Honorable Hon. Cynthia P. Smith,

1 Plaintiff Ignacio Moreno (“Plaintiff”) will apply for an order: (1) preliminarily approving
2 the proposed settlement of this class action with Defendants Domaine Chandon, Inc. and
3 Newton Vineyard LLC (collectively “Defendants”); (2) for settlement purposes only,
4 conditionally certifying the Class, which is comprised of “all individuals who are or
5 previously were employed by either Domaine Chandon, Inc. and/or Newton Vineyards LLC
6 in the State of California as a non-exempt hourly employee at any time during the Class
7 Period”, which is September 27, 2018 to November 3, 2023; (3) provisionally appointing
8 Plaintiff as the representative of the Class; (4) provisionally appointing Norman B.
9 Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik, and Christine T. LeVu of Blumenthal
10 Nordrehaug Bhowmik De Blouw LLP as Class Counsel; (5) approving the form and method
11 for providing class-wide notice; (6) directing that notice of the proposed settlement be given
12 to the Class; (7) appointing ILYM Group as Administrator, and (8) scheduling a final
13 approval hearing date, to be set four (4) months from preliminary approval, to consider
14 Plaintiff’s motion for final approval of the settlement and for approval of attorneys’ fees,
15 expenses and the service award.

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

23 Respectfully submitted,

24 Dated: September 6, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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