

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Blumenthal (SBN 068687)
Kyle R. Nordrehaug (SBN 205975)
Aparajit Bhowmik (SBN 248066)
Victoria B. Rivapalacio (SBN 275115)
Christine T. LeVu (SBN 288271)
Adolfo Sanchez Contreras (SBN 354371)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Email: Kyle@bamlawca.com
Website: www.bamlawca.com

Attorneys for Plaintiff

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

Hearing Date: February 11, 2025
Hearing Time: 8:30 a.m.
[Hearing set by Orders dated October 10,
2024 and October 24, 2024]

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 February 11, 2025, or as soon
thereafter as the matter can be heard, in Courtroom A at the above entitled Court before the

1 Honorable Cynthia P. Smith, Plaintiff Ignacio Moreno (“Plaintiff”) will move for an order
2 granting (1) Final Approval of the Class Action and PAGA Settlement and Award of Attorneys’
3 Fees Costs and Service Award, and (2) Entry of the Final Approval Order and Judgment.

4 This motion is brought in accordance with the Order Granting Preliminary Approval
5 dated October 24, 2024 , and California Rules of Court, rule 3.769. This Motion will be based
6 on this notice, the accompanying points and authorities, the Declaration of Norman Blumenthal,
7 the Class Action and PAGA Settlement Agreement (the “Agreement”), the Declaration of
8 Cassandra Polities (the Administrator), the Declaration of the Plaintiff, and the complete files
9 and records in this action.

10 Because Plaintiff and Defendants Domaine Chandon, Inc. and Newton Vineyard LLC
11 (collectively “Defendants”) have agreed to the proposed class settlement and have met and
12 conferred regarding the motion, this motion is not opposed. There have been no objections
13 submitted by the Class.

14 **The Napa Court uses a Tentative Ruling System. To receive the tentative ruling,**
15 **visit the Court’s website at <http://www.napa.courts.ca.gov> or telephone the Court at (707)**
16 **299-1270 after 3:00 p.m. the court day before the scheduled hearing date. Unless the Court**
17 **directs otherwise, no oral argument will be permitted unless a party or counsel for a party**
18 **requests a hearing by calling the Court and all other parties or counsel no later than 4:00**
19 **p.m. the court day before the hearing.**

20 Respectfully submitted,

21
22 Dated: January 15, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

23 By: /s/ Kyle Nordrehaug
24 Norman B. Blumenthal, Esq.
25 Kyle R. Nordrehaug, Esq.

26 Attorneys for Plaintiff
27
28