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Attorneys for Defendant TABC Inc.

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

ABEL YOUNG, an individual, on
behalf of himself and on behalf of all
persons similarly situated,

Plaintiff,

vs.

TABC, INC., a Corporation; and DOES
1 through 50, inclusive,

Defendants.

Case No. 22STCV25696

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

Hearing Date: July 27, 2023

Hearing Time: 10:00 a.m.

Judge: Hon. Lawrence P. Riff
Dept: SS-7

Date Filed: August 22, 2022

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on July 27, 2023 at 10:00 a.m., in

1 Department 7 of the above entitled Court before the Honorable Lawrence P. Riff, Plaintiff
2 Abel Young ("Plaintiff") and Defendant TABC Inc. ("TABC") (collectively, the "Parties")
3 will jointly move for an order: (1) preliminarily approving the proposed settlement of this
4 class action; (2) for settlement purposes only, conditionally certifying the Class, which is
5 comprised of "all current and former employees who worked for TABC in a non-exempt
6 position in California at any time from August 9, 2018 through April 7, 2023"; (3)
7 provisionally appointing Plaintiff as the representative of the Class; (4) provisionally
8 appointing Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik, Nicholas J. De
9 Blouw and Christine LeVu of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class
10 Counsel for the Class; (5) approving the form and method for providing notice to the Class
11 of the proposed settlement; (6) directing that notice of the proposed settlement be given to
12 the Class; (7) appointing ILYM Group, Inc. as the Administrator; and (8) scheduling a final
13 approval hearing date proposed for December 21, 2023 or as soon thereafter as is convenient
14 for the Court to consider the Parties' joint motion for final approval of the settlement and
15 entry of the Judgment, and Plaintiff's motion for approval of attorneys' fees and expenses.

16 This motion for preliminary approval of the class settlement is brought pursuant to
17 California Rules of Court, rule 3.769. Plaintiff's motion will be based on this notice of
18 motion and motion, the accompanying memorandum of points and authorities, the
19 Declaration of Kyle Nordrehaug, the Class Action and PAGA Settlement Agreement (the
20 "Agreement" or "Settlement") between the parties, and the complete files and records in this
21 action. Because all Parties have agreed to the proposed class settlement, this joint motion is
22 unopposed.

23 Respectfully submitted,

24 Dated: June 27, 2023

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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

27 Dated: June 27, 2023

PAUL HASTINGS LLP

28 By: /s/ Zachary P. Hutton

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Zachary P. Hutton, Esq.
Attorney for Defendant TABC Inc.