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

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

15 JILEEA JORDAN, an individual, on behalf
16 of herself and on behalf of all persons
17 similarly situated, and on behalf of the State
18 of California as a private attorney general,

19 Plaintiffs,

20 vs.

21 WAX CENTER PARTNERS
22 INTERMEDIATE HOLDCO LLC, a
23 Limited Liability Company; WAX
24 CENTER PARTNERS HOLDCO LLC, a
25 Limited Liability Company; and DOES 1
26 through 50, inclusive,

27 Defendants.

CASE NO.: **22CV018596**

[Consolidated with Case No. 22CV024363]

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

Hearing Date: February 16, 2024

Hearing Time: 9:00 a.m.

Reservation ID: 483049915868

Judge: Hon. Noel Wise

Dept.: 21

Action Filed: September 27, 2022

Trial Date: Not set

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

YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on February 16, 2024 in
Department 21 at the above entitled Court before the Honorable Noel Wise, Plaintiff Jileea
Jordan ("Plaintiff") will apply for an order: (1) preliminarily approving the proposed

1 settlement of this class action with Defendants Wax Center Partners Intermediate Holdco
2 LLC and Wax Center Partners Holdco LLC (“Defendants”); (2) for settlement purposes
3 only, conditionally certifying the Class, which is comprised of “all non-exempt employees
4 who worked in California for Defendants Wax Center Partners Intermediate Holdco LLC
5 and/or Wax Center Partners Holdco LLC at any time during the Class Period”, which is
6 September 27, 2018, through August 17, 2023; (3) provisionally appointing Plaintiff as the
7 representative of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R.
8 Nordrehaug, Aparajit Bhowmik, Nicholas J. DeBlouw, and Christine T. LeVu of
9 Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel; (5) approving the form
10 and method for providing class-wide notice; (6) directing that notice of the proposed
11 settlement be given to the class; (7) appointing ILYM Group as Administrator, and
12 (8) scheduling a final approval hearing date, proposed for June 26, 2024 which is at least
13 120 days from preliminary approval, to consider Plaintiff’s motion for final approval of the
14 settlement and for approval of attorneys’ fees and expenses.

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

22 Respectfully submitted,

23 Dated: January 24, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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