

1 **BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)

2 Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

3 Piya Mukherjee (State Bar #274217)

2255 Calle Clara

4 La Jolla, CA 92037

Telephone: (858)551-1223

5 Facsimile: (858) 551-1232

6 *(Additional Counsel on Signature Page)*

Attorneys for Plaintiffs

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **IN AND FOR THE COUNTY OF SAN MATEO**

14 Coordination Proceeding Special Title
15 (Rule 3.550)

16 **SOLARCITY WAGE AND HOUR
17 CASES**

18 Coordinated actions:

19 *Irving v. SolarCity Corp.*,
San Mateo County Superior Court,
20 Case No. CIV 525975

21 *Thomas v. SolarCity Corp.*,
San Diego County Superior Court,
22 Case No. 37-2017-00018317

JUDICIAL COUNCIL COORDINATION
PROCEEDING CASE NO. **JCCP 4945**

(Included actions: Case No. CIV 525975 and
Case No. 37-2017-00018317)

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

Hearing Date: September 13, 2018

Hearing Time: 10:00 a.m.

[Hearing Scheduled by the Court]

Judge: Hon. Marie S. Weiner

Dept: 2

Action Filed: December 24, 2013

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on September 13, 2018, or as
3 soon thereafter as the matter can be heard, in Department 2 of the above entitled Court before
4 the Honorable Marie S. Weiner, Plaintiffs Anita Irving, Les Thomas, Breana Daugherty, Jason
5 Wool, and Felicia Kim (collectively, "Plaintiffs") will move for an order (1) preliminarily
6 approving the proposed settlement of this class action with Defendant SolarCity Corporation
7 ("Defendant"); (2) approving the form and method for providing class-wide notice;
8 (3) directing that notice of the proposed settlement be given to the class; and (4) scheduling a
9 final approval hearing date to consider Plaintiffs' request for final approval of the settlement,
10 entry of the Judgment, and Plaintiffs' application for attorneys' fees and reimbursement of
11 litigation expenses.

12 Plaintiffs' Motion will be based on this notice of motion and motion, the
13 accompanying points and authorities, the Declaration of Norman Blumenthal, The
14 Declaration of Jamin S. Soderstrom, the Declaration of Shaun Setareh, the Joint Stipulation
15 of Class Action Settlement and Release ("Stipulation" or "Settlement") between the parties,
16 and the complete files and records in this action. Because all Parties have agreed to the
17 proposed class settlement, this motion is not opposed by Defendant.

18 Respectfully submitted,

19 Dated: August 28, 2018

20 **BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

21 
22 By: _____

23 Norman B. Blumenthal, Esq.
Kyle R. Nordrehaug, Esq.

24 SODERSTROM LAW PC
25 Jamin Soderstrom (State Bar No. 261054)
26 Three Park Plaza, Suite 100
27 Irvine, CA 92614
Tel: (949) 667-4700
Fax: (949) 424-8091
jamin@soderstromlawfirm.com

28 SETAREH LAW GROUP

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Shaun Setareh (State Bar No. 204514)
shaun@setarehlaw.com
9454 Wilshire Boulevard, Ste. 907
Beverly Hills, California 90212
Tel: (310) 888-7771, Fax: (310) 888-0109

Attorney for Plaintiffs