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

14 **IN AND FOR THE COUNTY OF SANTA CLARA**

15 JAYMIE SALINAS and GLORIA
16 ZAMORA, individually, on behalf of
17 themselves and on behalf of all persons
18 similarly situated,

19 Plaintiff,

20 vs.

21 HOMEFIRST SERVICES OF SANTA
22 CLARA COUNTY, a California
23 Non-Profit Corporation; and DOES 1
24 through 50, inclusive,

25 Defendants.

Case No. 23CV418047

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

Hearing Date: December 5, 2024
Hearing Time: 1:30 p.m.

Judge: Hon. Charles F. Adams
Dept.: 7

Action Filed: June 27, 2023
Trial Date: Not set

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

27 YOU ARE HEREBY NOTIFIED THAT on December 5, 2024 at 1:30 p.m., in
28 Department 7 of the above entitled Court before the Honorable Charles F. Adams, Plaintiffs
Jaymie Salinas and Gloria Zamora ("Plaintiffs") will move for an order: (1) preliminarily

1 approving the proposed settlement of this class action with Defendant HomeFirst Services of
2 Santa Clara County (“Defendant”); (2) for settlement purposes only, conditionally certifying
3 the Class, which is comprised of “all current and former hourly employees employed by
4 Defendant in California who were classified as non-exempt during the Class Period”, which
5 is June 27, 2019 through February 14, 2024; (3) provisionally appointing Plaintiffs as the
6 representatives of the Class; (4) provisionally appointing Blumenthal Nordrehaug Bhowmik
7 De Blouw LLP as Class Counsel for the Class; (5) approving the form and method for
8 providing notice to the Class of the proposed settlement; (6) directing that notice of the
9 proposed settlement be given to the Class; (7) appointing ILYM Group as the Administrator;
10 and (8) scheduling a final approval hearing date for April 17, 2025 to consider the Plaintiffs’
11 motion for final approval of the settlement and for approval of attorneys’ fees, expenses and
12 the service awards.

13 This motion for preliminary approval of the class settlement is brought pursuant to
14 California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this notice of
15 motion and motion, the accompanying memorandum of points and authorities, the
16 Declaration of Kyle Nordrehaug, the Declarations of the Plaintiffs, the Class Action and
17 PAGA Settlement Agreement (the “Agreement”) between the parties, and the complete files
18 and records in this action. Because all Parties have agreed to the proposed class settlement,
19 this motion is unopposed.

20 Respectfully submitted,

21 Dated: November 4, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

22 By: /s/ Kyle Nordrehaug
23 Kyle R. Nordrehaug, Esq.
24 Attorney for Plaintiffs
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