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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF GLENN**

FABIAN MARTINEZ, PAUL ADAMS,
MICHAEL RUSH, and RICHARD L.
YOUNG, individually on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

JOHNS MANVILLE, a Corporation; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **23CV03097**

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

Hearing Date: April 16, 2025

Hearing Time: 2:30 p.m.

*[Hearing scheduled by Order dated November
25, 2024]*

Judge: Hon. Alicia Ekland
Dept.: 2

Action Filed: March 15, 2023

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 2:30 p.m. on April 16, 2025, or as soon thereafter
3 as the matter can be heard, in Department 2 of the above entitled Court before the Honorable Alicia
4 Ekland, Plaintiffs Fabian Martinez, Paul Adams, Michael Rush, and Richard L. Young (“Plaintiffs”)
5 will move for an order granting (1) Final Approval of the Class Action Settlement, including approval
6 of the attorneys’ fees, costs and service awards, and (2) Entry of the Final Approval Order and the
7 Judgment.

8 This motion is brought in accordance with the Order dated November 25, 2024, and California
9 Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and
10 authorities, the Declaration of Norman Blumenthal, the Class Action and PAGA Settlement Agreement
11 (the “Agreement”), the Declaration of Madely Nava (the Administrator), the Declarations of the
12 Plaintiffs, and the complete files and records in this action. There have been no objections submitted
13 by the Class.

14 Respectfully submitted,

15 Dated: March 20, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

By: /s/ Kyle Nordrehaug
Kyle R. Nordrehaug
Attorneys for Plaintiffs