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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA CLARA**

DAIJA WALKER and ADAM JOY,
individually and on behalf of other
individuals similarly situated,

Plaintiff,

vs.

CROSSROADS TRADING CO., INC, a
California corporation; and DOES 1
through 10, inclusive,

Defendants.

Case No. 23CV416909

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

Hearing Date: August 21, 2024
Hearing Time: 1:30 p.m.

Judge: Hon. Theodore C. Zayner
Dept.: 19

Action Filed: June 6, 2023
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT on August 21, 2024 at 1:30 p.m., in

1 Department 19 of the above entitled Court before the Honorable Theodore C. Zayner,
2 Plaintiffs Daija Walker and Adam Joy (“Plaintiffs”) will move for an order: (1) preliminarily
3 approving the proposed settlement of this class action with Defendant Crossroads Trading
4 Co., Inc. (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class,
5 which is comprised of “all individuals who are or previously were employed by Defendant
6 in California and classified as non-exempt employees at any time during the Class Period”,
7 which is November 1, 2019 through May 27, 2024; (3) provisionally appointing Plaintiff as
8 the representatives of the Class; (4) provisionally appointing Blumenthal Nordrehaug
9 Bhowmik De Blouw LLP and Bradley/Grombacher, LLP as Class Counsel for the Class; (5)
10 approving the form and method for providing notice to the Class of the proposed settlement;
11 (6) directing that notice of the proposed settlement be given to the Class; (7) appointing
12 Apex Class Action LLC as the Administrator; and (8) scheduling a final approval hearing
13 date for January 8, 2025 to consider the Plaintiffs’ motion for final approval of the
14 settlement and for approval of attorneys’ fees, expenses and the service awards.

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

22 Respectfully submitted,

23 Dated: July 26, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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