

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
Aparajit Bhowmik (State Bar #248066)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Email: Kyle@bamlawca.com
Website: www.bamlawca.com

BRADLEY/GROMBACHER, LLP

Marcus Bradley, Esq. (SBN 174156)
Kiley Grombacher, Esq. (SBN 245960)
31365 Oak Crest Drive, Suite 240
Westlake Village, CA 91361
Telephone: (805) 270-7100
Facsimile: (805) 270-7589
Email: mbradley@bradleygrombacher.com
Email: kgrombacher@bradleygrombacher.com

Attorneys for Plaintiffs

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

Hearing Date: January 8, 2025
Hearing Time: 1:30 p.m.
[Hearing scheduled by Order dated August 26,
2024]

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

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

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

2 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on January 8, 2025, or as soon
3 thereafter as the matter can be heard, in Department 19 at the above entitled Court before the
4 Honorable Theodore C. Zayner, Plaintiffs Daija Walker and Adam Joy (“Plaintiffs”) will move
5 for an order granting (1) Final Approval of the Class Action Settlement, including approval of
6 the attorneys’ fees, costs and service awards, and (2) Entry of the Final Approval Order and
7 Judgment.

8 This motion is brought in accordance with the Order dated August 26, 2024, and
9 California Rules of Court, Rule 3.769. This Motion will be based on this notice, the
10 accompanying points and authorities, the Declaration of Norman Blumenthal, the Declaration
11 of Marcus Bradley, the Class Action and PAGA Settlement Agreement (the “Agreement”), the
12 Declaration of Madely Nava (the Administrator), the Declarations of Plaintiffs, and the
13 complete files and records in this action.

14 Because Plaintiffs and Defendant Crossroads Trading Co., Inc. (“Defendant”) have
15 agreed to the proposed class settlement and have met and conferred regarding the motion, this
16 motion is not opposed. There have been no objections submitted by the Class.

17 Respectfully submitted,

18 Dated: December 12, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

20 By: /s/ Kyle Nordrehaug
21 Kyle R. Nordrehaug, Esq.
22 Attorneys for Plaintiffs
23
24
25
26
27
28