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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

LOUIS NORIEGA and THERESA MOORE,
individuals, on behalf of themselves and on
behalf of all persons similarly situated,

Plaintiffs,

vs.

QVC, INC., a Corporation; and DOES 1
through 50, inclusive,

Case No.: **CIVSB2319032**

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

Assigned for all Purposes to:
Hon. Jessica Morgan
Dept. S-26

Hearing Date: December 13, 2024
Hearing Time: 8:30 a.m.
Dept.: S-26

Action Filed: August 9, 2023
Trial Date: Not set

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2 **TO THE COURT, ALL PARTIES AND TO THEIR COUNSEL OF RECORD:**

3 PLEASE TAKE NOTICE that on December 13, 2024, at 8:30 a.m., in Department S-26 of
4 the above-captioned Court, located at 247 W. Third St., San Bernardino, California, plaintiffs Louis
5 Noriega and Theresa Moore will move the Court for preliminary approval of a proposed class action
6 settlement in the above-captioned action under Cal. Rule of Court 3.769. The terms of the settlement
7 are contained within the Class Action and PAGA Settlement Agreement (the "Agreement"), filed
8 concurrently herewith as Exhibit 1 to the Declaration of Sepideh Ardestani. In addition, Plaintiffs
9 request that the Court certify the class described in the] Agreement; approve the form of class notice
10 attached as Exhibit A to the] Agreement; approve Crosner Legal P.C. and Blumenthal Nordrehaug
11 Bhowmik De Blouw LLP as Class Counsel and plaintiffs Louis Noriega and Theresa Moore as the
12 Class Representatives, approve Simpluris, Inc. as the Administrator, and set a final approval hearing
13 for May 28, 2025, or the first available date on the Court's calendar thereafter.

14 This motion will be based on this Notice, the accompanying Memorandum of Points and
15 Authorities, the Agreement, the accompanying Declarations of Sepideh Ardestani, Kyle
16 Nordrehaug, Eric Springer, Louis Noriega and Theresa Moore, the Court's entire file herein, and on
17 such further evidence and argument as may be presented at the hearing.

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19 Dated: October 16, 2024

**BLUMENTAL NORDREHAUG BHOWMIK DE BLOW
LLP
CROSNER LEGAL, P.C.**

21 By: /s/ Kyle Nordrehaug

22 Kyle Nordrehaug
23 Sepideh Ardestani
24 Jamie Serb
25 Zachary Crosner

26 Attorneys for Plaintiffs Louis Noriega and Theresa Moore
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