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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF VENTURA

KARL VANCE, an individual, on behalf
of himself and on behalf of all persons
similarly situated,

Plaintiff,

vs.

CS CONTRACT SOLUTIONS, LLC, a
Limited Liability Company; FRONTIER
COMMUNICATIONS OF AMERICA,
INC., a Corporation; FRONTIER
CALIFORNIA INC., a California
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 2023CUOE012162

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

Hearing Date: August 12, 2025

Hearing Time: 8:30 a.m.

[Hearing scheduled by Order April 3, 2025]

Judge: Hon. Benjamin F. Coats

Dept.: 43

Action Filed: July 28, 2023

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on August 12, 2025, or as soon
3 thereafter as the matter can be heard, in Department 43 at the above entitled Court before the
4 Honorable Benjamin F. Coats, Plaintiff Karl Vance (“Plaintiff”) will move for an order granting
5 (1) Final Approval of the Class Action Settlement, including approval of the attorneys’ fees,
6 costs and service award, and (2) Entry of the Final Approval Order and Judgment.

7 This motion is brought in accordance with the Order dated April 3, 2025, and California
8 Rules of Court, Rule 3.769. This Motion will be based on this notice, the accompanying points
9 and authorities, the Declaration of Norman Blumenthal, the Class Action and PAGA Settlement
10 Agreement (the “Agreement”), the Declaration of Ryan McNamee (the Administrator), the
11 Declaration of Plaintiff, and the complete files and records in this action.

12 Because Plaintiff and Defendant CS Contract Solutions, LLC (“Defendant”) have agreed
13 to the proposed class settlement and have met and conferred regarding the motion, this motion
14 is not opposed. There have been no objections submitted by the Class.

15 Respectfully submitted,

16 Dated: July 17, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

18 By: /s/ Kyle Nordrehaug
19 Kyle R. Nordrehaug, Esq.
Attorneys for Plaintiff