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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
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Hearing Date: March 25, 2025

Hearing Time: 8:30 a.m.

Judge: Hon. Benjamin F. Coats
Dept.: 43

Action Filed: July 28, 2023

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on March 25, 2025 in
Department 43 at the above entitled Court before the Honorable Benjamin F. Coats, Plaintiff
Karl Vance ("Plaintiff") will apply for an order: (1) preliminarily approving the proposed
settlement of this class action with Defendant CS Contract Solutions, LLC ("Defendant");

1 (2) for settlement purposes only, conditionally certifying the Class, which is comprised of
2 “all individuals employed by Defendant in California and classified as a non-exempt
3 employee at any time during the Class Period”, which is July 28, 2019 to December 21,
4 2024; (3) provisionally appointing Plaintiff as the representative of the Class; (4)
5 provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class
6 Counsel; (5) approving the form and method for providing class-wide notice; (6) directing
7 that notice of the proposed settlement be given to the Class; (7) appointing Apex Class
8 Action, LLC as the Administrator, and (8) scheduling a final approval hearing date,
9 proposed for August 12, 2025, to consider Plaintiff’s motion for final approval of the
10 settlement and for approval of attorneys’ fees, expenses and the service award.

11 This unopposed motion for preliminary approval of the class settlement is brought
12 pursuant to California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this
13 notice of motion and motion, the accompanying memorandum of points and authorities, the
14 Declaration of Kyle Nordrehaug, the Class Action and PAGA Settlement Agreement
15 (“Agreement”) between the Parties, and the complete files and records in this action.
16 Because all Parties have agreed to the proposed class settlement, this motion is not opposed
17 by Defendant.

18 Tentative rulings will be available by 4:00 p.m. on the court day preceding the
19 scheduled date of the hearing. Tentative rulings may be obtained on the court's website at
20 www.ventura.courts.ca.gov. Parties are encouraged to use the court’s website to obtain
21 tentative rulings. Parties without internet access may call the judicial secretary for the
22 courtroom of the hearing.

23 Respectfully submitted,

24 Dated: February 26, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

25 By: /s/ Kyle Nordrehaug
26 Kyle R. Nordrehaug, Esq.
27 Attorney for Plaintiff
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