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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **IN AND FOR THE COUNTY OF SACRAMENTO**

15 LUCY LEE, an individual, on behalf of
16 herself and on behalf of all persons
17 similarly situated,

18 Plaintiffs,

19 vs.

20 SACRAMENTO CREDIT UNION, a
21 California Corporation; and DOES 1
22 through 50, inclusive,

23 Defendants.

CASE NO.: **23CV005661**

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

Hearing Date: January 31, 2025

Hearing Time: 9:00 a.m.

Reservation ID # **A-05661-001**

Judge: Hon. Jill H. Talley

Dept: 23

Date 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 9:00 a.m. on January 31, 2025 in
3 Department 23 at the above entitled Court before the Honorable Jill H. Talley, Plaintiff Lucy
4 Lee (“Plaintiff”) will apply for an order: (1) preliminarily approving the proposed settlement
5 of this class action with Defendant Sacramento Credit Union (“Defendant”); (2) for
6 settlement purposes only, conditionally certifying the Class, which is comprised of “all
7 individuals who are or previously were employed by Defendant who were classified as
8 non-exempt in the State of California at any time during the Class Period”; (3) provisionally
9 appointing Plaintiff as the representative of the Class; (4) provisionally appointing Norman
10 B. Blumenthal, Kyle R. Nordrehaug, and Aparajit Bhowmik of Blumenthal Nordrehaug
11 Bhowmik De Blouw LLP as Class Counsel; (5) approving the form and method for
12 providing class-wide notice; (6) directing that notice of the proposed settlement be given to
13 the class; (7) appointing Apex Class Action as Administrator, and (8) scheduling a final
14 approval hearing date, proposed for June 20, 2025 which is at least 120 days from
15 preliminary approval, to consider Plaintiff’s motion for final approval of the settlement and
16 for approval of attorneys’ fees and expenses.

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

24 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits
25 of this matter by 2:00 p.m., the court day before the hearing. The complete text of the
26 tentative ruling may be downloaded off the court's website. If the party does not have online
27 access, they may call the dedicated phone number for the department as referenced in the
28 local telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day

1 before the hearing and receive the tentative ruling. If you do not call the court and the
2 opposing party by 4:00 p.m. the court day before the hearing, no hearing will be held.

3 Respectfully submitted,

4 Dated: December 30, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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