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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

STEVEN REMINGTON, an individual,
on behalf of himself and on behalf of all
persons similarly situated,

Plaintiffs,

vs.

JIMBO'S NATURAL FAMILY, INC., a
California Corporation; and DOES 1
through 50, inclusive,

Defendants.

CASE NO.: **37-2023-00038108-CU-OE-CTL**

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

Hearing Date: August 2, 2024

Hearing Time: 8:30 a.m.

Judge: Hon. Blaine K. Bowman
Dept.: 74

Date Action Filed: August 31, 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 August 2, 2024 in
Department 74 at the above entitled Court before the Honorable Blaine K. Bowman,

1 Plaintiff Steven Remington (“Plaintiff”) will apply for an order: (1) preliminarily approving
2 the proposed settlement of this class action with Defendant Jimbo's Natural Family, Inc.
3 (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class, which is
4 comprised of “all individuals who were employed by Defendant in California and classified
5 as a non-exempt employee at any time during the Class Period”; (3) provisionally appointing
6 Plaintiff as the representative of the Class; (4) provisionally appointing Norman B.
7 Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik, Nicholas J. De Blouw, Jeffrey S.
8 Herman, Sergio J. Puche, and Trevor G. Moran of Blumenthal Nordrehaug Bhowmik De
9 Blouw LLP as Class Counsel; (5) approving the form and method for providing class-wide
10 notice; (6) directing that notice of the proposed settlement be given to the Class; (7)
11 appointing ILYM Group, Inc. as Administrator, and (8) scheduling a final approval hearing
12 date, proposed for December 6, 2024 to consider Plaintiff’s motion for final approval of the
13 settlement and for approval of attorneys’ fees and expenses.

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

21 Respectfully submitted,

22 Dated: July 9, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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