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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

LUIS RAMIREZ and ANA BALAGTAS, individuals, on behalf of themselves and on behalf of all persons similarly situated, and on behalf of the State of California, as a private attorney general,

Plaintiffs,

vs.

CLASSIC RESIDENCE MANAGEMENT LIMITED PARTNERSHIP, a Limited Partnership; and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **37-2023-00039329-CU-OE-CTL**

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

Hearing Date: November 13, 2026
Hearing Time: 9:30 p.m.

Judge: Hon. Marcella O. McLaughlin
Dept.: 72

Date Action Filed: September 11, 2023
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on November 13, 2026, in Department 72 at the above entitled Court before the Honorable Marcella O. McLaughlin, Plaintiffs Luis Ramirez and Ana Balagtas ("Plaintiffs") will apply for an order:
(1) preliminarily approving the proposed settlement of this class action with Defendant Classic Residence Management Limited Partnership ("Defendant"); (2) for settlement purposes only, conditionally certifying the Class, which is comprised of "all individuals who are or previously were employed by Defendant who were classified as non-exempt in the State of California during the Class Period", which is March 18, 2021 through May 28, 2026; (3) provisionally appointing Plaintiffs as the representatives of the Class; (4) provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP and Wilshire Law Firm as Class Counsel; (5) approving the form and method for providing class-wide notice; (6) directing that notice of the proposed settlement be given to the Class; (7) appointing ILYM Group, Inc. as Administrator, and (8) scheduling a final approval hearing date, proposed for April 23, 2027, to consider Plaintiffs' motion for final approval of the settlement and for approval of attorneys' fees, expenses and the service awards.

This unopposed motion for preliminary approval of the class settlement is brought pursuant to California Rules of Court, rule 3.769. Plaintiffs' motion will be based on this notice of motion and motion, the accompanying memorandum of points and authorities, the Declaration of Kyle Nordrehaug, the Declaration of John Yslas, the Declarations of the Plaintiffs, the Class Action and PAGA Settlement Agreement ("Agreement") between the Parties, and the complete files and records in this action. Because all Parties have agreed to the proposed class settlement, this motion is not opposed by Defendant.

Respectfully submitted,

Dated: October 19, 2026

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP
By: */s/ Kyle Nordrehaug*
Kyle R. Nordrehaug, Esq.
Attorney for Plaintiffs