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

14 **IN AND FOR THE COUNTY OF SAN DIEGO**

15 ROGERBERTO BENITEZ, an individual,
16 on behalf of himself and on behalf of all
17 persons similarly situated,

18 Plaintiffs,

19 vs.

20 HYATT CORPORATION, a Corporation;
21 and DOES 1 through 50, inclusive,

22 Defendants.

CASE No. **37-2023-00028524-CU-OE-CTL**

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

Hearing Date: January 31, 2025

Hearing Time: 9:30 a.m.

*[Hearing scheduled by Order dated
September 6, 2024]*

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

Date Action Filed: July 7, 2023

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on January 31, 2024, or as soon
3 thereafter as the matter can be heard, in Department 72 at the above entitled Court before the
4 Honorable Marcella O. McLaughlin, Plaintiff Rogeberto Benitez (“Plaintiff”) will move for an
5 order granting (1) Final Approval of the Class Action Settlement, including approval of the
6 attorneys’ fees, costs and service award, and (2) Entry of the Final Approval Order and the
7 Judgment.

8 This motion is brought in accordance with the Order dated September 6, 2024, and
9 California Rules of Court, rule 3.769. This Motion will be based on this notice, the
10 accompanying points and authorities, the Declaration of Norman Blumenthal, the Class Action
11 and PAGA Settlement Agreement (the “Agreement”), the Declaration of Nick Castro (the
12 Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

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

16 Respectfully submitted,

17 Dated: January 6, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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