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

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

15 SARAH DULFER, an individual, on
16 behalf of herself and on behalf of all
17 persons similarly situated,

18 Plaintiffs,

19 vs.

20 WEST COAST SELF-STORAGE
21 GROUP, LLC, a Limited Liability
22 Company; and DOES 1 through 50,
23 inclusive,

24 Defendants.

CASE NO.: 30-2023-01359316-CU-OE-CXC

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

Hearing Date: October 19, 2026

Hearing Time: 1:30 p.m.

Reservation No. 74901831

Judge: Hon. David A. Hoffer

Dept.: CX103

Action Filed: November 3, 2023

Trial Date: Not Set

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

26 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on October 19, 2026, or as
27 soon thereafter as the matter can be heard, in Department CX103 at the above entitled Court
28 before the Honorable David A. Hoffer, Plaintiff Sara Duffer ("Plaintiff") will apply for an

1 order: (1) preliminarily approving the proposed settlement of this class action with
2 Defendant West Coast Self-Storage Group, LLC (“Defendant”); (2) for settlement purposes
3 only, conditionally certifying the Class, which is comprised of “all individuals who are or
4 previously were employed by Defendant who were classified as non-exempt in the State of
5 California at any time during the Class Period”, which is November 3, 2019 through April
6 26, 2025; (3) provisionally appointing Plaintiff as the representative of the Class; (4)
7 provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class
8 Counsel; (5) approving the form and method for providing class-wide notice; (6) directing
9 that notice of the proposed settlement be given to the class; (7) appointing Apex Class
10 Action LLC as Administrator; and (8) scheduling a final approval hearing date for March
11 15, 2027 to consider Plaintiff’s motion for final approval of the settlement and for approval
12 of attorneys’ fees and expenses.

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

20 Respectfully submitted,

21 Dated: July 15, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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