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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

LAURA WEITZ and LAILA FAIZ,
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.

BANANA REPUBLIC, LLC, a Limited
Liability Company; THE GAP, INC., a
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: **23STCV19287**

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

Hearing Date: September 24, 2025
Hearing Time: 10:00 a.m.

Judge: Hon. David S. Cunningham III
Dept: SS-11

Date Filed: April 17, 2023
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on September 24, 2025 in
Department 11 at the Spring Street Courthouse in the above entitled Court before the

1 Honorable David S. Cunningham III, Plaintiffs Laura Weitz and Laila Faiz (“Plaintiffs”)
2 will apply for an order: (1) preliminarily approving the proposed settlement of this class
3 action with Defendants Banana Republic, LLC and The Gap, Inc. (“Defendants”); (2) for
4 settlement purposes only, conditionally certifying the Class, which is comprised of “all
5 individuals who are or previously were employed by Defendants Banana Republic, LLC and
6 The Gap, Inc. who were classified as non-exempt retail store employees in the State of
7 California at any time during the Class Period”, which is October 27, 2022 through July 4,
8 2025; (3) provisionally appointing Plaintiffs as the representatives of the Class; (4)
9 provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP, Diversity Law
10 Group, P.C. and Polaris Law Group as Class Counsel; (5) approving the form and method
11 for providing class-wide notice; (6) directing that notice of the proposed settlement be given
12 to the class; (7) appointing ILYM Group, Inc. as the Administrator, and (8) scheduling a
13 final approval hearing date that is 120 days from preliminary approval, to consider
14 Plaintiffs’ motion for final approval of the settlement and for approval of attorneys’ fees,
15 expenses and service awards.

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

24 Respectfully submitted,

25 Dated: September 2, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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