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

14 **IN AND FOR THE COUNTY OF LOS ANGELES**

15 SELENE MURILLO, an individual, on
16 behalf of herself and on behalf of all
17 persons similarly situated,

18 Plaintiff,

19 vs.

20 CRANE WORLDWIDE LOGISTICS
21 LLC, a Limited Liability Company; and
22 DOES 1 through 50, inclusive,

23 Defendants.

Case No. 23STCV22869

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

Hearing Date: December 3, 2024
Hearing Time: 10:00 a.m.

Judge: Hon. Carolyn B. Kuhl
Dept: SS-12

Date Filed: September 21, 2023
Trial Date: Not set

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

25 YOU ARE HEREBY NOTIFIED THAT on December 3, 2024 at 10:00 a.m., in
26 Department 12 in the Spring Street Courthouse of the above entitled Court before the
27 Honorable Carolyn B. Kuhl, Plaintiff Selene Murillo ("Plaintiff") will move for an order:

(1) preliminarily approving the proposed settlement of this class action with Defendant Crane Worldwide Logistics LLC (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class, which is comprised of “all individuals who were employed by Defendant in California and classified as a non-exempt employee at any time during the Class Period”, which is September 21, 2019 to December 3, 2024; (3) provisionally appointing Plaintiff as the representative of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, and Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel for the Class; (5) approving the form and method for providing notice to the Class of the proposed settlement; (6) directing that notice of the proposed settlement be given to the Class; (7) appointing ILYM Group, Inc. as the Administrator; and (8) scheduling a final approval hearing date in approximately four months to consider the Plaintiff’s motion for final approval of the settlement and for approval of attorneys’ fees, expenses and the service award.

This motion for preliminary approval of the class settlement is brought pursuant to California Rules of Court, rule 3.769. Plaintiff’s 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 Plaintiff Selene Murillo, the Class Action and PAGA Settlement Agreement (the “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 unopposed.

Respectfully submitted,

Dated: September 30, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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