

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)

Kyle R. Nordrehaug (State Bar #205975)

Aparajit Bhowmik (State Bar #248066)

2255 Calle Clara

La Jolla, CA 92037

Telephone: (858)551-1223

Facsimile: (858) 551-1232

Email: Kyle@bamlawca.com

Website: www.bamlawca.com

GOMEZ TRIAL ATTORNEYS, APLC

John Gomez (State Bar #171485)

Emilia Arutunian (State Bar #305824)

755 Front Street

San Diego, CA, 92101

Tel: (619) 773-0111

Fax: (619) 237-3496

Email: john@gomeztrialattorneys.com; mila@thegomezfirm.com

Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

PAUL WILLIAMS, an individual, on
behalf of himself and on behalf of all
persons similarly situated,

Plaintiff,

vs.

ZOOLOGICAL SOCIETY OF SAN
DIEGO, a Corporation; and DOES 1
through 50, inclusive,

Defendants.

CASE NO.: **37-2023-00043072-CU-OE-CTL**

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

Hearing Date: March 28, 2025

Hearing Time: 10:30 a.m.

Judge: Hon. Richard S. Whitney
Dept.: 68

Date Action Filed: October 4, 2023

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on March 28, 2025 in
Department 68 at the above entitled Court before the Honorable Richard S. Whitney,

1 Plaintiff Paul Williams (“Plaintiff”) will apply for an order: (1) preliminarily approving the
2 proposed settlement of this class action with Defendant Zoological Society of San Diego
3 (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class, which is
4 comprised of “all individuals who were employed by Defendant in California and classified
5 and worked as a non-exempt employee at any time during the Class Period”, which is
6 October 4, 2019 to October 29, 2024; (3) provisionally appointing Plaintiff as the
7 representative of the Class; (4) provisionally appointing Norman B. Blumenthal, Kyle R.
8 Nordrehaug, Aparajit Bhowmik, Nicholas J. De Blouw, Jeffrey S. Herman, Sergio J. Puche,
9 and Trevor G. Moran of Blumenthal Nordrehaug Bhowmik De Blouw LLP and Emilia
10 Arutunian of The Gomez Trial Attorneys as Class Counsel; (5) approving the form and
11 method for providing class-wide notice; (6) directing that notice of the proposed settlement
12 be given to the Class; (7) appointing Apex Class Action as Administrator, and
13 (8) scheduling a final approval hearing date, proposed for August 22, 2025, to consider
14 Plaintiff’s motion for final approval of the settlement and for approval of attorneys’ fees,
15 expenses and the service award.

16 This unopposed motion for preliminary approval of the class settlement is brought
17 pursuant to California Rules of Court, rule 3.769. Plaintiff’s 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 Emilia Arutunian, the Declaration of the
20 Plaintiff, the Class Action and PAGA Settlement Agreement (“Agreement”) between the
21 Parties, and the complete files and records in this action. Because all Parties have agreed to
22 the proposed class settlement, this motion is not opposed by Defendant.

23 Respectfully submitted,

24 Dated: February 20, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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