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

Hearing Date: August 22, 2025
Hearing Time: 10:30 a.m.
[Hearing scheduled by Order dated April 1,
2025]

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

Date Action Filed: October 4, 2023
Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on August 22, 2025, or as soon
3 thereafter as the matter can be heard, in Department 68 at the above entitled Court before the
4 Richard S. Whitney, Plaintiff Paul Williams (“Plaintiff”) will move for an order granting: (1)
5 Final Approval of the Class Action Settlement, including approval of the attorneys’ fees, costs
6 and service award, and (2) Entry of the Final Approval Order and the Judgment.

7 This motion is brought in accordance with the Order dated April 1, 2024, and California
8 Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points
9 and authorities, the Declaration of Norman Blumenthal, the Class Action and PAGA Settlement
10 Agreement (the “Agreement”), the Declaration of Stacey Shim (the Administrator), the
11 Declaration of Plaintiff, and the complete files and records in this action.

12 Because Plaintiff and Defendant Zoological Society of San Diego (“Defendant”) have
13 agreed to the proposed class settlement and have met and conferred regarding the motion, this
14 motion is not opposed. There have been no objections submitted by the Class.

15 Respectfully submitted,

16 Dated: July 29, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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