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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **IN AND FOR THE COUNTY OF SACRAMENTO**
15

16 GREGORY TAYLOR, an individual, on
17 behalf of himself, and on behalf of all
18 persons similarly situate,

19 Plaintiffs,

20 vs.

21 RACE TELECOMMUNICATIONS,
22 LLC., a California Limited Liability
23 Company; and DOES 1 through 50,
24 inclusive,

25 Defendants.

CASE No. **23CV012232**

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

Hearing Date: September 5, 2025

Hearing Time: 9:00 a.m.

*[Hearing scheduled by Order dated April 29,
2025]*

Judge: Hon. Jill H. Talley

Dept: 23

Date Filed: November 27, 2023

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on September 5, 2025, or as soon
3 thereafter as the matter can be heard, in Department 23 of the above-entitled Court before the
4 Honorable Jill H. Talley, Plaintiff Gregory Taylor (“Plaintiff”) will move for an order granting
5 (1) Final Approval of the Class Action Settlement, including approval of the attorneys’ fees,
6 costs 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 29, 2025, 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 Nathalie Beltran (the Administrator), the
11 Declaration of the Plaintiff, and the complete files and records in this action.

12 Because Plaintiff and Defendant Race Telecommunications, LLC (“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 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this
16 matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative ruling may be
17 downloaded off the court's website. If the party does not have online access, they may call the dedicated
18 phone number for the department as referenced in the local telephone directory between the hours of
19 2:00 p.m. and 4:00 p.m. on the court day before the hearing and receive the tentative ruling. If you do
20 not call the court and the opposing party by 4:00 p.m. the court day before the hearing, no hearing will
21 be held.

22 Respectfully submitted,

23 Dated: August 8, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

24 By: /s/ Kyle Nordrehaug
25 Kyle R. Nordrehaug, Esq.
26 Attorneys for Plaintiffs
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