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

14 **IN AND FOR THE COUNTY OF ALAMEDA**

15 **ODDAE ALGHAZALI and WALLEED**
16 **ALGHAZALI**, individually, on behalf of
17 themselves and on behalf of all persons
18 similarly situated,

19 Plaintiffs,

20 vs.

21 **FORMEL D USA, INC.**, a Corporation; and
22 **DOES 1 through 50**, inclusive,

23 Defendants.

CASE NO.: **23CV059739**

**AMENDED NOTICE OF MOTION AND
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS AND REPRESENTATIVE
ACTION SETTLEMENT**

Hearing Date: November 12, 2025

Hearing Time: 1:30 p.m.

Reservation ID: 805165841162

Judge: Hon. Patrick McKinney
Dept.: 18

Action Filed: November 21, 2023

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on November 12, 2025 in
3 Department 18 at the above entitled Court before the Honorable Patrick McKinney,
4 Plaintiffs Oddae Alghazali and Walleed Alghazali (“Plaintiffs”) will apply for an order:

5 (1) granting preliminary approval the proposed settlement of this class and PAGA
6 action with Defendant Formel D USA, Inc. (“Defendant”);

7 (2) for settlement purposes only, conditionally certifying the Class, which is
8 comprised of “all individuals who were employed by Defendant in the State of California
9 and classified as non-exempt employees at any time during the Class Period”, which
10 is November 21, 2019 through April 27, 2025;

11 (3) provisionally appointing Plaintiffs as the Class Representatives for settlement
12 purposes only;

13 (4) provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, and
14 Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel;

15 (5) approving the form and method for providing class-wide notice;

16 (6) directing that notice of the proposed settlement be given to the class;

17 (7) provisionally appointing and approving Apex Class Action as Administrator; and,

18 (8) scheduling a final approval hearing date, proposed for April 22, 2026, which is at
19 least 120 days from preliminary approval, to consider Plaintiffs’ motion for final approval of
20 the settlement and for approval of attorneys’ fees and expenses.

21 This unopposed motion for preliminary approval of the class settlement is brought
22 pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion is based on this notice
23 of motion and motion, the accompanying memorandum of points and authorities, the
24 Declaration of Kyle Nordrehaug, the Declarations of the Plaintiffs, the Agreement between
25 the Parties, the complete files and records in this action, and any other evidence or oral
26 argument which may be considered by the Court at the time of the hearing. Because all
27 Parties have agreed to the proposed class settlement, this motion is not opposed by
28 Defendant.

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Respectfully submitted,

Dated: October 29, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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