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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN MATEO

CELESTE JACOBS, DAVID HALEY, and
GABRIEL A. REYES, individuals, on behalf
of themselves and on behalf of all persons
similarly situated,

Plaintiff,

vs.

DPR CONSTRUCTION, INC., a
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 23-CIV-05852

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

Hearing Date: October 7, 2026

Hearing Time: 2:00 p.m.

*[Hearing scheduled by Order dated March
12, 2026]*

Judge: Hon. Nicole S. Healy

Dept: 28

Date Filed: December 11, 2023

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 2:00 p.m. on October 7, 2026, or as soon
3 thereafter as the matter can be heard, in Department 28 at the above entitled Court before the
4 Honorable Nicole S. Healy, Plaintiffs Celeste Jacobs, David Haley and Gabriela Reyes
5 (“Plaintiffs”) will move for an order granting (1) Final Approval of the Class Action Settlement,
6 including approval of the attorneys’ fees, costs and service awards, and (2) Entry of the Final
7 Approval Order and Judgment.

8 This motion is brought in accordance with the Order dated March 12, 2026, and
9 California Rules of Court, Rule 3.769. This Motion will be based on this notice, the
10 accompanying points and authorities, the Declaration of Kyle R. Nordrehaug, the Class Action
11 and PAGA Settlement Agreement (the “Agreement”), the Declaration of Madely Nava (the
12 Administrator), the Declarations of the Plaintiffs, and the complete files and records in this
13 action.

14 Because Plaintiffs and Defendant DPR Construction, Inc. (“Defendant”) have agreed to
15 the proposed class settlement and have met and conferred regarding the motion, this motion is
16 not opposed. There has been only one (1) objection submitted by the Class.

17 Respectfully submitted,

18 Dated: September 10, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

20 By: /s/ Kyle Nordrehaug
21 Kyle R. Nordrehaug, Esq.
22 Attorneys for Plaintiffs
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