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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
UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Hearing Date: February 25, 2026

Hearing Time: 2:00 p.m.

Judge: Hon. Nicole S. Healy

Dept: 28

Date Filed: December 11, 2023

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 2:00 p.m. on February 25, 2026 in
Department 28, at the above entitled Court before the Honorable Nicole S. Healy, or as soon
thereafter as is available for the Court, Plaintiffs Celeste Jacobs, David Haley, and Gabriel

1 A. Reyes (“Plaintiffs”) will apply for an order: (1) preliminarily approving the proposed
2 settlement of this class action with Defendant DPR Construction, Inc. (“Defendant”); (2) for
3 settlement purposes only, conditionally certifying the Class, which is comprised of “all
4 individuals who are or previously were employed by Defendant who were classified as
5 non-exempt in the State of California at any time during the Class Period”, which is
6 December 11, 2019 through May 27, 2025; (3) provisionally appointing Plaintiffs as the
7 representatives of the Class; (4) provisionally appointing Blumenthal Nordrehaug Bhowmik
8 De Blouw LLP as Class Counsel; (5) approving the form and method for providing class-
9 wide notice; (6) directing that notice of the proposed settlement be given to the Class; (7)
10 appointing Apex Class Action as the Administrator, and (8) scheduling a final approval
11 hearing date, proposed for July 23, 2026, to consider Plaintiffs’ motion for final approval of
12 the settlement and for approval of attorneys’ fees, expenses and the service awards.

13 This unopposed motion for preliminary approval of the class settlement is brought
14 pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this
15 notice of motion and motion, the accompanying memorandum of points and authorities, the
16 Declaration of Kyle Nordrehaug, the Declarations of the Plaintiffs, the Class Action and
17 PAGA Settlement Agreement and Release (“Agreement”) between the Parties, and the
18 complete files and records in this action. Because all Parties have agreed to the proposed
19 class settlement, this motion is not opposed by Defendant.

20 Respectfully submitted,

21 Dated: August 14, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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