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

14 **IN AND FOR THE COUNTY OF SANTA CLARA**

15 FERUZ MIRZA-ALIEV, an individual,
16 on behalf of himself and on behalf of all
17 persons similarly situated,

18 Plaintiff,

19 vs.

20 800 MOFFETT MV MANAGER, LLC, a
21 limited liability company; and DOES 1
22 through 50, inclusive,

23 Defendants.

CASE NO.: **24CV431503**

**NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL OF
CLASS SETTLEMENT**

Hearing Date: January 15, 2026
Hearing Time: 1:30 p.m.

Judge: Hon. Charles F. Adams
Dept.: 7

Action Filed: February 23, 2024
Trial Date: Not set

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

25 YOU ARE HEREBY NOTIFIED THAT on January 15, 2026 at 1:30 p.m., in
26 Department 7 of the above entitled Court before the Honorable Charles F. Adams, Plaintiff
27 Feruz Mirza-Aliev ("Plaintiff") will move for an order: (1) preliminarily approving the
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1 proposed settlement of this class action with Defendant 800 Moffett MV Manager, LLC
2 d/b/a The Ameswell Hotel (“Defendant”); (2) for settlement purposes only, conditionally
3 certifying the Class, which is comprised of “all individuals who are or previously were
4 employed by and worked for Defendant, who were classified as non-exempt in the State of
5 California at any time during the Class Period”, which February 23, 2020 through April 8,
6 2025; (3) provisionally appointing Plaintiff as the representative of the Class; (4)
7 provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class
8 Counsel for the Class; (5) approving the form and method for providing notice to the Class
9 of the proposed settlement; (6) directing that notice of the proposed settlement be given to
10 the Class; (7) appointing ILYM Group, Inc. as the Administrator; and (8) scheduling a final
11 approval hearing date, proposed for June 4, 2026, to consider the Plaintiff’s motion for final
12 approval of the settlement and for approval of attorneys’ fees, expenses and the service
13 award.

14 This motion for preliminary approval of the class settlement is brought pursuant to
15 California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this notice of
16 motion and motion, the accompanying memorandum of points and authorities, the
17 Declaration of Kyle Nordrehaug, the Declarations of the Plaintiff, the Class Action and
18 PAGA Settlement Agreement (the “Agreement”) between the parties, and the complete files
19 and records in this action. Because all Parties have agreed to the proposed class settlement,
20 this motion is unopposed.

21 Respectfully submitted,

22 Dated: December 18, 2025 **BLUMENTHAL NORDREHAUG BHOWMIK**
DE BLOUW LLP

23 By: /s/ Kyle Nordrehaug
24 Kyle R. Nordrehaug, Esq.,
25 Attorney for Plaintiff
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