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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

FRANK TOWNS and STEVEN
QUIRINO, individually, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiff,

vs.

CORE & MAIN LP, a limited partnership; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO.: 37-2024-00006393-CU-OE-CTL

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

Hearing Date: April 3, 2026

Hearing Time: 1:30 p.m.

*[Hearing scheduled by Order dated
November 18, 2025]*

Judge: Hon. Katherine Bacal

Dept.: 63

Date Action Filed: March 20, 2024

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 April 3, 2026, in
3 Department 63 at the above entitled Court before the Honorable Katherine Bacal, Plaintiffs
4 Frank Towns and Steven Quirino (“Plaintiffs”) will apply for an order: (1) preliminarily
5 approving the proposed settlement of this class action with Defendant Core & Main LP
6 (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class, which is
7 comprised of “all current and former non-exempt California employees of Defendant at any
8 time during the Class Period”, which is November 16, 2021 through January 22, 2026; (3)
9 provisionally appointing Plaintiffs as the representatives of the Class; (4) provisionally
10 appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP and Frontier Law Center as
11 Class Counsel; (5) approving the form and method for providing class-wide notice;
12 (6) directing that notice of the proposed settlement be given to the Class; (7) appointing
13 Apex Class Action LLC as Administrator, and (8) scheduling a final approval hearing date,
14 proposed for August 28, 2026, to consider Plaintiffs’ motion for final approval of the
15 settlement and for approval of attorneys’ fees, expenses and the service awards.

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

23 Respectfully submitted,

24 Dated: March 9, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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