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

14 **IN AND FOR THE COUNTY OF LOS ANGELES**

15 ZION ESTRADA, an individual, on
16 behalf of herself and on behalf of all
17 persons similarly situated,

18 Plaintiff,

19 vs.

20 WILLIAMS LEA LLC, a Limited
21 Liability Company; and DOES 1 through
22 50, inclusive,

23 Defendants.

CASE NO.: **23STCV29851**

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

Hearing Date: February 10, 2026

Hearing Time: 10:00 a.m.

Judge: Hon. Samantha Jessner
Dept: SS-7

Action Filed: May 20, 2024

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:00 a.m. on February 26, 2026 in
3 Department 7 at the Spring Street Courthouse in the above entitled Court before the
4 Honorable Samantha Jessner, Plaintiff Zion Estrada (“Plaintiff”) will apply for an order:
5 (1) preliminarily approving the proposed settlement of this class action with Defendant
6 Williams Lea LLC (“Defendant”); (2) for settlement purposes only, conditionally certifying
7 the Class, which is comprised of “all individuals who are or previously were employed by
8 Defendant who were classified as non-exempt in the State of California during the Class
9 Period”, which is March 17, 2022 to August 21, 2025; (3) provisionally appointing Plaintiff
10 as the representative of the Class; (4) provisionally appointing Blumenthal Nordrehaug
11 Bhowmik De Blouw LLP as Class Counsel; (5) approving the form and method for
12 providing class-wide notice; (6) directing that notice of the proposed settlement be given to
13 the class; (7) appointing Apex Class Action LLC as the Administrator, and (8) scheduling a
14 final approval hearing date that is 120 days from preliminary approval, to consider
15 Plaintiff’s motion for final approval of the settlement and for approval of attorneys’ fees,
16 expenses and service award.

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

24 Respectfully submitted,

25 Dated: September 30, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

By: /s/ Kyle Nordrehaug

Kyle R. Nordrehaug, Esq.
Attorney for Plaintiff