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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

MARIA SANCHEZ and PAUL
WILLIAMS, individually, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiff,

vs.

MISSION BAY MANAGEMENT, LLC, a
limited liability company; and DOES 1 through
50, inclusive,

Defendants.

CASE NO.: **37-2024-00013022-CU-OE-CTL**

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

Hearing Date: October 31, 2025

Hearing Time: 1:30 p.m.

Judge: Hon. Katherine Bacal
Dept.: 63

Date Action Filed: March 20, 2024

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on October 31, 2025 in
Department 63 at the above entitled Court before the Honorable Katherine Bacal, Plaintiffs
Maria Sanchez and Paul Williams ("Plaintiffs") will apply for an order: (1) preliminarily

1 approving the proposed settlement of this class action with Defendant Mission Bay
2 Management, LLC (“Defendant”); (2) for settlement purposes only, conditionally certifying
3 the Class, which is comprised of “all individuals who were employed by Defendant in
4 California and classified as non-exempt employees at any time during the Class Period”,
5 which is March 20, 2020 to April 17, 2025; (3) provisionally appointing Plaintiffs as the
6 representatives of the Class; (4) provisionally appointing Blumenthal Nordrehaug Bhowmik
7 De Blouw LLP and Gomez Trial Attorneys, APLC as Class Counsel; (5) approving the form
8 and method for providing class-wide notice; (6) directing that notice of the proposed
9 settlement be given to the Class; (7) appointing Apex Class Action LLC as Administrator,
10 and (8) scheduling a final approval hearing date, proposed for March 20, 2026, to consider
11 Plaintiffs’ motion for final approval of the settlement and for approval of attorneys’ fees,
12 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 (“Agreement”) between the Parties, and the complete files and
18 records in this action. Because all Parties have agreed to the proposed class settlement, this
19 motion is not opposed by Defendant.

20 Respectfully submitted,

21 Dated: October 7, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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