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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN

MARVIN BENEGAS, an individual, on behalf of himself and on behalf of all persons imilarly situated,

Plaintiff,

vs.

CONTINENTAL MARITIME OF SAN DIEGO, LLC, a Limited Liability Company; HII SAN DIEGO SHIPYARD INC., a Corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 37-2024-00002946-CU-OE-CTL

NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT AND AWARD OF ATTORNEYS' FEES, COSTS AND SERVICE AWARD

Hearing Date: December 4, 2026
Hearing Time: 10:30 a.m.
[*Hearing scheduled by Order dated July 10, 2026*]

Judge: Hon. Loren G. Freestone
Dept.: 64

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

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on December 4, 2026, or as soon thereafter as the matter can be heard, in Department 66 at the above entitled Court before the Honorable Loren G. Freestone, Plaintiff Marvin Benegas ("Plaintiff") will move for an order granting (1) Final Approval of the Class Action Settlement, including approval of the attorneys' fees, costs and service award, and (2) Entry of the Final Approval Order and Judgment.

This motion is brought in accordance with the Order dated July 10, 2026 and California Rules of Court, Rule 3.769. This Motion will be based on this notice, the accompanying points and authorities, the Declaration of Kyle R. Nordrehaug, the Class Action and PAGA Settlement Agreement (the "Agreement"), the Declaration of Norma Ayala (the Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

Because Plaintiff and Defendants Continental Maritime of San Diego, LLC and HII San Diego Shipyard, Inc. ("Defendants") have agreed to the proposed class settlement and have met and conferred regarding the motion, this motion is not opposed. There have been no objections submitted by the Class.

Respectfully submitted,

Dated: November 5, 2026

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

By: */s/ Kyle Nordrehaug*
Kyle R. Nordrehaug, Esq.
Attorneys for Plaintiff