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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF LOS ANGELES**

ENYLLEL RUGAMA-HERNANDEZ  
and EDGAR SANTIAGO, as individuals,  
and on behalf of themselves and on behalf  
of all persons similarly situated,

Plaintiffs,

vs.

P & B INTERMODAL SERVICES  
LIMITED LIABILITY COMPANY, a  
Limited Liability Company; and DOES 1  
through 50, inclusive,

Defendants.

CASE NO.: **24STCV07771**

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

Hearing Date: September 25, 2025  
Hearing Time: 11:00 a.m.

Judge: Hon. Timothy Patrick Dillon  
Dept: SS-15

Date Filed: March 29, 2024  
Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 11:00 a.m. on September 25, 2025 in  
3 Department 15 at the Spring Street Courthouse in the above entitled Court before the  
4 Honorable Timothy Patrick Dillon, Plaintiffs Enyllel Rugama-Hernandez and Edgar  
5 Santiago (“Plaintiffs”) will apply for an order: (1) preliminarily approving the proposed  
6 settlement of this class action with Defendant P & B Intermodal Services Limited Liability  
7 Company (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class,  
8 which is comprised of “all individuals who were employed by Defendant in California and  
9 classified as a non-exempt employee at any time during the Class Period”, which is March  
10 29, 2020 through March 27, 2025; (3) provisionally appointing Plaintiffs as the  
11 representatives of the Class; (4) provisionally appointing Blumenthal Nordrehaug Bhowmik  
12 De Blouw LLP and Lavi & Ebrahimian, LLP as Class Counsel; (5) approving the form and  
13 method for providing class-wide notice; (6) directing that notice of the proposed settlement  
14 be given to the class; (7) appointing Apex Class Action LLC as the Administrator, and  
15 (8) scheduling a final approval hearing date that is 120 days from preliminary approval, to  
16 consider Plaintiffs’ motion for final approval of the settlement and for approval of attorneys’  
17 fees, expenses and service awards.

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

25 Respectfully submitted,

26 Dated: July 23, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK  
DE BLOUW LLP**

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