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Superior Court of California,
County of Los Angeles
6/08/2026 5:16 PM
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Executive Officer/Clerk of Court,
By S. Drew, Deputy Clerk

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14 (*Additional Counsel Listed Below*)

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17 SUPERIOR COURT OF THE STATE OF CALIFORNIA
18 FOR THE COUNTY OF LOS ANGELES

19 Herman Pappoe, Jesse Perez, Fatoumata Barry,
20 and Amelia Myers, individually and on behalf of
21 all others similarly situated, the Collective and as
22 private attorney generals under the Private
Attorneys General Act,

23 Plaintiffs,

24 vs.

25 Kite Pharma, Inc., Gilead Sciences, Inc., and Does
26 1 through 10,

27 Defendants.
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Case No. 24STCV02259

CLASS ACTION

(Assigned to the Hon. Samantha P. Jessner –
Dept. 7)

**Notice of Motion for Preliminary Approval
of Class, Collective, and PAGA Action
Settlement**

Date: September 28, 2026
Time: 11:00 a.m.
Dept.: 7

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14 *Attorneys for Plaintiffs*
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1 **PLEASE TAKE NOTICE** that on September 28, 2026 at 11:00 a.m. in Department 7 of the
2 above-entitled court located at 312 North Spring Street, Los Angeles, CA 90012, Plaintiffs Herman
3 Pappoe, Jesse Perez, Fatoumata Barry, and Amelia Myers will and hereby do move for the following:

- 4 1. Preliminary approval of the settlement of this class, Collective and PAGA action on the terms set
5 forth in the Joint Stipulation of Class Action Settlement, a copy of which is attached as ***Exhibit 1***
6 to the Declaration of Lonnie C. Blanchard III filed herewith;
- 7 2. Conditional certification of the following class for settlement purposes only:
8 all non-exempt employees of any of the Defendants who worked in California between
9 January 29, 2020, and June 8, 2026, subject to approval by the Court.
- 10 3. Preliminary appointment of Lonnie C. Blanchard III and the law firm of The Blanchard Law
11 Group, APC, Justin Swartz, Jennifer Davidson, and Jahan Sagafi of Outten & Golden LLP, and
12 Jeff Holmes of the Holmes Law Group, APC as class counsel for settlement purposes only;
- 13 4. Preliminary appointment of Herman Pappoe, Jesse Perez, Fatoumata Barry, and Amelia Myers as
14 the Class Representatives;
- 15 5. Appointment of Apex Class Action LLC as the Claims Administrator; and
- 16 6. Entry of an order directing the dissemination of notice in the form and manner set forth in the
17 Class, Collective and Representative Action Settlement and Release and setting a schedule for a
18 Final Approval hearing on a date calculated in accordance with its provisions.

19 This Motion is based on this Notice, the supporting Memorandum of Points and Authorities, the
20 Declarations of Lonnie C. Blanchard III, Justin Swartz, Mike Sutherland, Herman Pappoe, Jesse Perez,
21 Fatoumata Barry, and Amelia Myers, the pleadings and papers on file in this action, and any other
22 matter of which the Court may take notice.

1 Dated: June 8, 2026

2 BLANCHARD LAW GROUP, APC

3
4 BY: 

5 BLANCHARD LAW GROUP
6 LONNIE BLANCHARD

7 OUTTEN & GOLDEN LLP
8 JUSTIN SWARTZ
9 JENNIFER DAVIDSON

10 Attorney for Plaintiffs Herman Pappoe, Jesse Perez,
11 Fatoumata Barry Yapo, and Amelia Myers
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on interested parties in this action addressed as follows:

(By Mail) I deposited such envelope with postage thereon fully prepaid in the United States mail at a facility regularly maintained by the United States Postal Service at Los Angeles, California.

(By Email) Based on a court order, Rules of Court, or an agreement of the parties to accept electronic service, I caused the documents to be sent to the person(s) at the email addresses set forth above.

(By Overnight Delivery) I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the address(es) identified above. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

xxx (By Case Anywhere) A true and correct copy was electronically served on counsel of record by transmission to Case Anywhere.

Kale Morita
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