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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN MATEO

EDWARD YOUNG, an individual, on
behalf of himself and on behalf of all
persons similarly situated,

Plaintiff,

vs.

MAINSRING ENERGY, INC., a
corporation; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: **24-CIV-01894**

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

Hearing Date: May 13, 2025

Hearing Time: 2:00 p.m.

Judge: Hon. Nancy L. Fineman

Dept: 4

Courtroom: 4C

Date Filed: March 27, 2024

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 2:00 p.m. on May 13, 2025 in
Department 4, Courtroom 4C, at the above entitled Court before the Honorable Nancy L.
Fineman, Plaintiff Edward Young ("Plaintiff") will apply for an order: (1) preliminarily

1 approving the proposed settlement of this class action with Defendant Mainspring Energy,
2 Inc. (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class,
3 which is comprised of “all individuals who were employed by Defendant in California as a
4 non-exempt employee at any time during the Class Period”; (3) provisionally appointing
5 Plaintiff as the representative of the Class; (4) provisionally appointing Blumenthal
6 Nordrehaug Bhowmik De Blouw LLP as Class Counsel; (5) approving the form and method
7 for providing class-wide notice; (6) directing that notice of the proposed settlement be given
8 to the Class; (7) appointing Apex Class Action as Administrator, and (8) scheduling a final
9 approval hearing date, proposed for September 30, 2025, to consider Plaintiff’s motion for
10 final approval of the settlement and for approval of attorneys’ fees, expenses and the service
11 award.

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

19 Respectfully submitted,

20 Dated: March 4, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

21 By: /s/ Kyle Nordrehaug
22 Kyle R. Nordrehaug, Esq.
23 Attorney for Plaintiff
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