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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

LEON COYLE, an individual, on behalf of himself and on behalf of all persons similarly situated and allegedly aggrieved,

Plaintiff,

vs.

ESET, LLC, a Limited Liability Company; and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **25CU002846C**
[Related to 25CU004456C]

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

Hearing Date: December 11, 2026
Hearing Time: 9:10 a.m.

Judge: Hon. Judy S. Bae
Dept.: 62

Date Action Filed: January 16, 2025
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 9:10 a.m. on December 11, 2026 in Department 64 at the above entitled Court before the Honorable Judy S. Bae, Plaintiff Leon Coyle ("Plaintiff") will apply for an order: (1) preliminarily approving the proposed settlement of this class and Private Attorneys General Act ("PAGA") action with Defendant ESET, LLC ("Defendant"); (2) for settlement purposes only, conditionally certifying the Class, which is comprised of "all non-exempt employees who worked for Defendant in California during the Class Period", which is January 16, 2021, through August 13, 2026; (3) provisionally appointing Plaintiff as the representative of the Class; (4) provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP and Gomez Law Firm as Class Counsel; (5) approving the form and method for providing class-wide notice; (6) directing that notice of the proposed settlement be given to the Class; (7) appointing Apex Class Action LLC as the Administrator, and (8) scheduling a final approval hearing date, proposed for May 14, 2027, to consider Plaintiff's motion for final approval of the settlement and for approval of attorneys' fees, expenses and the representative service award.

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

Respectfully submitted,

Dated: November 13, 2026

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP
By: */s/ Kyle Nordrehaug*
Kyle R. Nordrehaug, Esq.
Attorney for Plaintiff