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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF TULARE

ROBERT BERRY, an individual, on behalf of himself and on behalf of all persons similarly situated, and on behalf of the State of California, as a private attorney general,

Plaintiff,

vs.

WILDFIRE DEFENSE SYSTEMS, INC., a Corporation; and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **VCU315054**

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

Hearing Date: October 29, 2026
Hearing Time: 8:30 a.m.
[*Hearing scheduled by Order dated March 16, 2026*]

Judge: Hon. David C. Mathias
Dept.: 1

Date Action Filed: November 13, 2024
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. on October 29, 2026, or as soon thereafter as the matter can be heard, in Department 1 at the above entitled Court before the Honorable David C. Mathias, Plaintiff Robert Berry ("Plaintiff") will move for an order granting (1) Final Approval of the Class Action Settlement, including approval of the attorneys' fees, costs and service awards, and (2) Entry of the Final Approval Order and the Judgment.

This motion is brought in accordance with the Order dated March 16, 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 Nordrehaug, the Class Action and PAGA Settlement Agreement (the "Agreement"), the Declaration of Missy Carey (the Administrator), the Declaration of the Plaintiff, and the complete files and records in this action.

Because Plaintiff and Defendant Wildfire Defense Systems, Inc. ("Defendant") 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: October 5, 2026

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

By: *<u>/s/ Kyle Nordrehaug</u>*
Kyle R. Nordrehaug

Attorneys for Plaintiff