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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN DIEGO**

CHEYENNE GARCIA, an individual, on
behalf of herself and on behalf of all
persons similarly situated,

Plaintiff,

vs.

LIBOR MANAGEMENT LLC, a limited
liability company; CHOICE HOTELS
INTERNATIONAL SERVICES CORP.,
a corporation; CHOICE HOTELS
INTERNATIONAL, INC., a corporation;
and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **24CU006073C**

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

Hearing Date: August 21, 2026
Hearing Time: 10:15 a.m.

Judge: Hon. Wendy M. Behan
Dept.: 66

Date Action Filed: August 15, 2024
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 10:15 a.m. on August 21, 2026 in
Department 66 at the above entitled Court before the Honorable Wendy M. Behan, Plaintiff

1 Cheyenne Garcia (“Plaintiff”) will apply for an order: (1) preliminarily approving the
2 proposed settlement of this class and Private Attorneys General Act (“PAGA”) action with
3 Defendants Libor Management LLC, Choice Hotels International Services Corp, and Choice
4 Hotels International, Inc. (collectively “Defendants”); (2) for settlement purposes only,
5 conditionally certifying the Class, which is comprised of “all individuals who are or
6 previously were employed by Defendants in California and classified as a non-exempt
7 employee at any time during the Class Period”, which is September 19, 2023 through
8 January 8, 2026; (3) provisionally appointing Plaintiff as the representative of the Class; (5)
9 provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP and Centurion
10 Trial Attorneys, APC as Class Counsel; (6) approving the form and method for providing
11 class-wide notice; (7) directing that notice of the proposed settlement be given to the Class;
12 (8) appointing Apex Class Action LLC as Administrator, and (9) scheduling a final approval
13 hearing date, proposed for January 15, 2027, to consider Plaintiff’s motion for final approval
14 of the settlement and for approval of attorneys’ fees, expenses and the representative service
15 award.

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

24 Respectfully submitted,

25 Dated: July 28, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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