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Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF VENTURA**

MATTHEW KAUFMAN, an individual,
on behalf of himself and on behalf of all
persons similarly situated,

Plaintiff,

vs.

JOHNSON CONTROLS FIRE
PROTECTION LP, a Limited Partnership;
and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **2025CUOE049338**

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

Hearing Date: September 16, 2026
Hearing Time: 1:30 p.m.

Judge: Hon. Charmaine H. Buehner
Dept.: 44

Action Filed: August 15, 2025
Trial Date: Not set

1 **TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

2 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on September 16, 2026 in
3 Department 44 at the above entitled Court before the Honorable Charmaine H. Buehner,
4 Plaintiff Matthew Kaufman ("Plaintiff") will apply for an order: (1) preliminarily approving
5 the proposed settlement of this class action with Defendant Johnson Controls Fire Protection
6 LP ("Defendant"); (2) for settlement purposes only, conditionally certifying the Class, which
7 is comprised of "all current or former non-exempt employees employed by Defendant in
8 California at any time during the Class Period", which is August 11, 2024 through June 27,
9 2026; (3) provisionally appointing Plaintiff as the representative of the Class; (4)
10 provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP and Lawyers for
11 Employee and Consumer Rights, APC as Class Counsel; (5) approving the form and method
12 for providing class-wide notice; (6) directing that notice of the proposed settlement be given
13 to the Class; (7) appointing Apex Class Action as the Administrator, and (8) scheduling a
14 final approval hearing date, proposed for February 10, 2027, to consider Plaintiff's motion
15 for final approval of the settlement and for approval of attorneys' fees, expenses and the
16 service award.

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

24 Tentative rulings will be available by 4:00 p.m. on the court day preceding the
25 scheduled date of the hearing. Tentative rulings may be obtained on the court's website at
26 www.ventura.courts.ca.gov. Parties are encouraged to use the court's website to obtain
27 tentative rulings. Parties without internet access may call the judicial secretary for the
28 courtroom of the hearing.

1 Respectfully submitted,

2 Dated: August 17, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

3 By: /s/ Kyle Nordrehaug
4 Kyle R. Nordrehaug, Esq.
5 Attorney for Plaintiff

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