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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN BERNARDINO

CESAR SANCHEZ and DONNELL
PETETAN, an individual, on behalf of
himself and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

CRST LINCOLN SALES, INC., an Iowa
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: **CIVSB2518258**

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

Hearing Date: June 16, 2026

Hearing Time: 8:30 a.m.

Judge: Hon. Charlie L. Hill, Jr.
Dept.: 30

Date Action Filed: June 25, 2025

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 June 16, 2026 in
Department 30 at the above entitled Court before the Honorable Charlie L. Hill, Jr.,
Plaintiffs Cesar Sanchez and Donnell Petetan ("Plaintiffs") will apply for an order:

1 (1) preliminarily approving the proposed Class Action and PAGA Settlement Agreement
2 (“Agreement”) with Defendant CRST Lincoln Sales, Inc. (“Defendant”); (2) for settlement
3 purposes only, conditionally certifying the Class, which is comprised of “all individuals who
4 are or previously were employed by Defendant who were classified as non-exempt or hourly
5 in the State of California at any time during the Class Period”, which is June 25, 2021
6 through April 16, 2026; (3) provisionally appointing Plaintiffs as the representatives of the
7 Class; (4) provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP and
8 Brock & Gonzales, LLP as Class Counsel; (5) approving the form and method for providing
9 class-wide notice of the settlement; (6) directing that notice of the proposed settlement be
10 given to the Class; (7) appointing Apex Class Action LLC as the Administrator; and,
11 (8) scheduling a final approval hearing date, proposed for October 27, 2026, to consider
12 Plaintiffs’ motion for final approval of the settlement and for approval of attorneys’ fees,
13 expenses and the service awards.

14 This unopposed motion for preliminary approval of the class settlement is brought
15 pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this
16 notice of motion and motion, the accompanying memorandum of points and authorities, the
17 Declaration of Kyle Nordrehaug, The Declaration of Joseph Parsons, the Declarations of the
18 Plaintiffs, the Agreement between the Parties, and the complete files and records in this
19 action. Because all Parties have agreed to the proposed class settlement, this motion is not
20 opposed by Defendant.

21 Respectfully submitted,

22 Dated: May 20, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

By: /s/ Kyle Nordrehaug
Kyle R. Nordrehaug, Esq.
Attorney for Plaintiffs