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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ALAMEDA

ELYAS WAZIRI, an individual, on behalf of himself and on behalf of all persons similarly situated,

Plaintiff,

vs.

BOEHRINGER INGELHEIM FREMONT, INC., a Corporation; and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **25CV117181**

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

Hearing Date: November 17, 2026
Hearing Time: 2:30 p.m.
Reservation ID: 304615932350

Judge: Hon. Somnath Raj Chatterjee
Dept.: 21

Action Filed: March 28, 2025
Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 2:30 p.m. on November 17, 2026, in Department 21 at the above entitled Court before the Honorable Somnath Raj Chatterjee, Plaintiff Elyas Waziri ("Plaintiff") will apply for an order:

(1) granting preliminary approval the proposed settlement of this class and PAGA action with Defendant Boehringer Ingelheim Fremont, Inc.("Defendant");

(2) for settlement purposes only, conditionally certifying the Class, which is comprised of "all employees who are or previously were employed by Defendant, including those who signed arbitration agreements, and were classified as non-exempt at any time during the Class Period", which is March 28, 2021 to February 11, 2026;

(3) provisionally appointing Plaintiff as the Class Representative for settlement purposes only;

(4) provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP 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) provisionally appointing and approving ILYM Group, Inc. as Administrator; and,

(8) scheduling a final approval hearing date, proposed for April 13, 2027, which is at least 120 days from preliminary approval, to consider Plaintiff's motion for final approval of the settlement and for approval of attorneys' fees and expenses.

This unopposed motion for preliminary approval of the class settlement is brought pursuant to California Rules of Court, rule 3.769. Plaintiff's motion is based on this notice of motion and motion, the accompanying memorandum of points and authorities, the Declaration of Kyle Nordrehaug, the Declaration of the Plaintiff, the Class Action and PAGA Settlement Agreement between the Parties, the complete files and records in this action, and any other evidence or oral argument which may be considered by the Court at the time of the hearing. Because all Parties have agreed to the proposed class settlement, this motion is not opposed by Defendant.

Respectfully submitted,

Dated: October 21, 2026

BLUMENTHAL NORDREHAUG BHOWMIK DE BLOUW LLP

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