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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

14 **IN AND FOR THE COUNTY OF LOS ANGELES**

15 JAMES HERNANDEZ, an individual, on
16 behalf of himself and on behalf of all
17 persons similarly situated,

18 Plaintiff,

19 vs.

20 VERIZON CORPORATE SERVICES
21 GROUP INC., a Corporation; VERIZON
22 CORPORATE RESOURCES GROUP
23 LLC, a Limited Liability Company; and
24 Does 1 through 50, Inclusive,

25 Defendants.

CASE NO.: **24STCV20608**

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

Hearing Date: January 2, 2026

Hearing Time: 9:00 a.m.

[Hearing set by Order dated October 24,
2025]

Judge: Hon. Elihu M. Berle

Dept: SS-6

Action Filed: August 15, 2024

Trial Date: Not set

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

27 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on January 2, 2026 in
28 Department 6 at the Spring Street Courthouse in the above entitled Court before the

1 Honorable Elihu M. Berle, Plaintiff James Hernandez (“Plaintiff”) will apply for an order:
2 (1) preliminarily approving the proposed settlement of this class action with Defendants
3 Verizon Corporate Services Group, Inc. and Verizon Corporate Resources Group LLC
4 (collectively, “Defendants”); (2) for settlement purposes only, conditionally certifying the
5 Class, which is comprised of “all individuals who are or previously were employed by
6 Defendants in California and classified as non-exempt employees at any time during the
7 Class Period”, which is August 15, 2020 through September 25, 2025; (3) provisionally
8 appointing Plaintiff as the representatives of the Class; (4) provisionally appointing
9 Blumenthal Nordrehaug Bhowmik De Blouw LLP and Centurion Trial Attorneys, APC as
10 Class Counsel; (5) approving the form and method for providing class-wide notice;
11 (6) directing that notice of the proposed settlement be given to the class; (7) appointing
12 Apex Class Action LLC as the Administrator, and (8) scheduling a final approval hearing
13 date that is 120 days from preliminary approval, to consider Plaintiff’s motion for final
14 approval of the settlement and for approval of attorneys’ fees, expenses and service award.

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

22 Respectfully submitted,

23 Dated: November 19, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

24 By: /s/ Kyle Nordrehaug
25 Kyle R. Nordrehaug, Esq.
26 Attorney for Plaintiff
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