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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF RIVERSIDE**

JOHN DEDET and THOMAS SANNER,  
individuals, on behalf of themselves and  
on behalf of all persons similarly situated,

Plaintiffs,

vs.

METAL CONTAINER (MCC) LP, a  
Limited Partnership; and DOES 1 through  
50, inclusive,

Defendants.

CASE NO.: **CVRI2405838**

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

Hearing Date: February 19, 2026

Hearing Time: 8:30 a.m.

**Reservation ID: 903998594540**

*[Hearing confirmed by Court at 1/21/26 status  
conference - See Minute Order dated 1/21/26]*

Judge: Hon. Harold W. Hopp

Dept: 1

Date Filed: October 17, 2024

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 8:30 a.m. a.m. on February 19, 2026 in  
3 Department 1 at the Historic Courthouse in the above entitled Court before the Honorable  
4 Harold W. Hopp, Plaintiffs John Dedet and Thomas Sanner (“Plaintiffs”) will apply for an  
5 order: (1) preliminarily approving the proposed settlement of this class action with  
6 Defendant Metal Container (MCC) LP (“Defendant”); (2) for settlement purposes only,  
7 conditionally certifying the Class, which consists of the California Class that is “all  
8 individuals who are or previously were employed by Defendant in California and classified  
9 as a non-exempt employee at any time during the Class Period”, which is September 1, 2021  
10 through July 24, 2025; (3) provisionally appointing Plaintiffs as the representatives of the  
11 Class; (4) provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP,  
12 Centurion Trial Attorneys, APC, and Bibiyan Law Group, P.C. as Class Counsel; (5)  
13 approving the form and method for providing class-wide notice; (6) directing that notice of  
14 the proposed settlement be given to the class; (7) appointing Apex Class Action LLC as the  
15 Administrator, and (8) scheduling a final approval hearing date, proposed for July 9, 2026,  
16 to consider Plaintiffs’ motion for final approval of the settlement and for approval of  
17 attorneys’ fees, expenses and service awards.

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

25 Respectfully submitted,

26 Dated: January 22, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK  
DE BLOUW LLP**

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