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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

BART CHAMBERLAIN and MALIK
AZIZ TAYLOR, AKA ROBERT
TAYLOR, individuals, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

NTT DATA AMERICAS, INC., a
Corporation; NTT DATA SERVICES
HOLDINGS CORPORATION, a
Corporation; NTT DATA SERVICES,
LLC, a Limited Liability Company; NTT
DATA STATE HEALTH
CONSULTING, LLC, a Limited Liability
Company; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: **24CV016003**

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

Hearing Date: November 21, 2025

Hearing Time: 9:00 a.m.

Reservation ID # **A-16003-001**

Judge: Hon. Jill H. Talley

Dept: 23

Date Filed: August 12, 2024

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on November 21, 2025 in
3 Department 23 at the above entitled Court before the Honorable Jill H. Talley, Plaintiffs Bart
4 Chamberlain and Robert (Malik) Taylor (“Plaintiffs”) will apply for an order:

5 (1) preliminarily approving the proposed settlement of this class action with Defendants
6 NTT DATA Americas, Inc., NTT DATA Services Holding Corporation, NTT DATA
7 Services LLC, and NTT DATA State Health Consulting, LLC (“Defendants”); (2) for
8 settlement purposes only, conditionally certifying the Class, which is comprised of “all
9 individuals who are or previously were employed by Defendants in California and classified
10 as a non-exempt employee at any time during the Class Period”, which is August 12, 2020
11 through October 11, 2025; (3) provisionally appointing Plaintiffs as the representatives of
12 the Class; (4) provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP
13 and the Otkupman Law Firm as Class Counsel; (5) approving the form and method for
14 providing class-wide notice; (6) directing that notice of the proposed settlement be given to
15 the class; (7) appointing Apex Class Action as Administrator, and (8) scheduling a final
16 approval hearing date, proposed for April 24, 2026 which is at least 120 days from
17 preliminary approval, to consider Plaintiffs’ motion for final approval of the settlement and
18 for approval of attorneys’ fees and expenses.

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

26 Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits
27 of this matter by 2:00 p.m., the court day before the hearing. The complete text of the
28 tentative ruling may be downloaded off the court's website. If the party does not have online

1 access, they may call the dedicated phone number for the department as referenced in the
2 local telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day
3 before the hearing and receive the tentative ruling. If you do not call the court and the
4 opposing party by 4:00 p.m. the court day before the hearing, no hearing will be held.

5 Respectfully submitted,

6 Dated: October 27, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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