

1 **BLUMENTHAL NORDREHAUG BHOWMIK**
2 **DE BLOUW LLP**

3 Norman B. Blumenthal (State Bar #068687)

4 Kyle R. Nordrehaug (State Bar #205975)

5 Aparajit Bhowmik (State Bar #248066)

6 2255 Calle Clara

7 La Jolla, CA 92037

8 Telephone: (858)551-1223

9 Facsimile: (858) 551-1232

10 Email: Kyle@bamlawca.com

11 Website: www.bamlawca.com

12 Attorneys for Plaintiff

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

14 **IN AND FOR THE COUNTY OF ALAMEDA**

15 ROBIN KONG, an individual, on behalf of
16 herself and on behalf of all persons
17 similarly situated,

18 Plaintiff,

19 vs.

20 MANOS HOME CARE, INC., a California
21 Corporation; and DOES 1 through 50,
22 inclusive,

23 Defendants.

CASE NO.: **24CV091691**

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

Hearing Date: April 7, 2026

Hearing Time: 2:30 p.m.

Reservation ID: 959265069346

Judge: Hon. Somnath Raj Chatterjee
Dept.: 21

Action Filed: September 17, 2024

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 2:30 p.m. on April 7, 2026, in
3 Department 21 at the above entitled Court before the Honorable Somnath Raj Chatterjee,
4 Plaintiff Robin Kong (“Plaintiff”) will apply for an order:

5 (1) granting preliminary approval the proposed settlement of this class and PAGA
6 action with Defendant Manos Home Care, Inc.(“Defendant”);

7 (2) for settlement purposes only, conditionally certifying the Class, which is
8 comprised of “all individuals who are or previously were employed by Defendant in
9 California and classified as non-exempt and/or exempt pursuant to the Personal Attendant
10 Exemption at any time during the Class Period”, which is September 17, 2020 through
11 December 31, 2025;

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

14 (4) provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, and
15 Aparajit Bhowmik of Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel;

16 (5) approving the form and method for providing class-wide notice;

17 (6) directing that notice of the proposed settlement be given to the class;

18 (7) provisionally appointing and approving ILYM Group, Inc. as Administrator; and,

19 (8) scheduling a final approval hearing date, proposed for September 29, 2026, which
20 is at least 120 days from preliminary approval, to consider Plaintiff’s motion for final
21 approval of the settlement and for approval of attorneys’ fees and expenses.

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

3 Respectfully submitted,

4 Dated: March 11, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

5 By: /s/ Kyle Nordrehaug
6 Kyle R. Nordrehaug, Esq.
7 Attorney for Plaintiff
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