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SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

SAMUEL GALLAGHER-STEVENSON, an
individual, on behalf of himself and on
behalf of all persons similarly situated,

Plaintiff,

vs.

INDEPENDENT LIVING SYSTEMS,
LLC., a Limited Liability Company; and
DOES 1 through 50, inclusive,

Defendants.

CASE NO.: **CGC-24-614434**

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

Hearing Date: July 21, 2026

Hearing Time: 9:00 a.m.

Judge: Hon. Joseph M. Quinn
Dept.: 302

Date Action Filed: May 6, 2024

Trial Date: Not set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 9:00 a.m. on July 21, 2026 in Department
302 at the above entitled Court before the Honorable Joseph M. Quinn, Plaintiff Samuel
Gallagher-Stevens ("Plaintiff") will apply for an order: (1) preliminarily approving the
proposed settlement of this class action with Defendant Independent Living Systems, LLC

1 (“Defendant”); (2) for settlement purposes only, conditionally certifying the Class, which is
2 comprised of “all individuals who were employed by Defendant in California and classified
3 as a non-exempt employee at any time during the Class Period”, which is May 6, 2020 to
4 April 27, 2025; (3) provisionally appointing Plaintiff as the representative of the Class; (4)
5 provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class
6 Counsel; (5) approving the form and method for providing class-wide notice; (6) directing
7 that notice of the proposed settlement be given to the Class; (7) appointing Apex Class
8 Action LLC as Administrator, and (8) scheduling a final approval hearing date, proposed for
9 December 16, 2026, to consider Plaintiff’s motion for final approval of the settlement and
10 for approval of attorneys’ fees, expenses and the service award.

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

18 Respectfully submitted,

19 Dated: June 18, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

20 By: /s/ Kyle Nordrehaug
21 Kyle R. Nordrehaug, Esq.
22 Attorney for Plaintiff
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