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Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN JOAQUIN

SYDNEY KEMP, an individual, on behalf
of himself and on behalf of all persons
similarly situated,

Plaintiff,

vs.

MEDTRANS LLC, a Limited Liability
Company; MEDTRUCKING, LLC, a Limited
Liability Company; and DOES 1 through 50,
inclusive,

Defendants.

CASE NO.: **STK-CV-UOE-2024-0006856**

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

Hearing Date: _____

Hearing Time: 9:00 a.m.

[Proposed hearing dates are: 7/6/26, 7/7/26,
7/9/26, 7/13/26, and 7/15/26]

Judge: Hon. Blanca A. Banuelos

Dept.: 10B

Date Action Filed: June 11, 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 a date to be set by the clerk,
in Department 10B at the above entitled Court before the Honorable Blanca A. Banuelos,

1 Plaintiff Sydney Kemp (“Plaintiff”) will apply for an order: (1) preliminarily approving the
2 proposed settlement of this class and Private Attorneys General Act (“PAGA”) action with
3 Defendant Medtrans, LLC (“Defendant”); (2) for settlement purposes only, conditionally
4 certifying the Class, which is comprised of “all individuals who are or previously were
5 employed by Defendant in California and classified as non-exempt employees at any time
6 during the Class Period”, which is June 11, 2020 to August 2, 2025; (3) provisionally
7 appointing Plaintiff as the representatives of the Class; (4) provisionally appointing
8 Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel; (5) approving the form
9 and method for providing class-wide notice; (6) directing that notice of the proposed
10 settlement be given to the Class; (7) appointing Apex Class Action LLC as Administrator,
11 and (8) scheduling a final approval hearing date, proposed for December 1, 2026, to
12 consider Plaintiff’s motion for final approval of the settlement and for approval of attorneys’
13 fees, expenses and the representative service award.

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

21 Respectfully submitted,

22 Dated: June 8, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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