

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Norman B. Blumenthal (State Bar #068687)
Kyle R. Nordrehaug (State Bar #205975)
Aparajit Bhowmik (State Bar #248066)
2255 Calle Clara
La Jolla, CA 92037
Telephone: (858)551-1223
Facsimile: (858) 551-1232
Email: Kyle@bamlawca.com
Website: www.bamlawca.com

Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ORANGE**

AMALIA RODRIGUEZ, an individual,
on behalf of herself and on behalf of all
persons similarly situated,

Plaintiffs,

vs.

COVIDIEN LP, a Limited Partnership;
MEDTRONIC, INC., a Corporation;
MEDTRONIC USA, INC., a Corporation;
and DOES 1 through 50, inclusive,

Defendants.

CASE NO.: 30-2024-01394865-CU-OE-CXC

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

Hearing Date: June 11, 2026
Hearing Time: 2:00 p.m.
Reservation No. 74810728

Judge: Hon. Melissa R. McCormick
Dept.: CX105

Action Filed: April 18, 2024
Trial Date: Not Set

TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 2:00 p.m. on June 11, 2026, or as soon
thereafter as the matter can be heard, in Department CX105 at the above entitled Court
before the Honorable Melissa R. McCormick, Plaintiff Amalia Rodriguez ("Plaintiff") will

1 apply for an order: (1) preliminarily approving the proposed settlement of this class and
2 PAGA action with Defendant Covidien LP (“Defendant”); (2) for settlement purposes only,
3 conditionally certifying the Class defined as: “all individuals who are or previously were
4 employed by Defendant who were classified as non-exempt in the State of California at any
5 time during the Class Period”, which is September 16, 2021, through November 11, 2025;
6 (3) provisionally appointing Plaintiff as the representative of the Class; (4) provisionally
7 appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class Counsel; (5)
8 approving the form and method for providing class-wide notice; (6) directing that notice of
9 the proposed settlement be given to the class; (7) appointing ILYM Group, Inc. as
10 Administrator; and (8) scheduling a final approval hearing date for November 5, 2026 to
11 consider Plaintiff’s motion for final approval of the settlement and for approval of attorneys’
12 fees and expenses.

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

20 Respectfully submitted,

21 Dated: March 27, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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