

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 LOS ANGELES**

15 JOEL VELEZ, an individual, on behalf of
16 himself and on behalf of all persons
17 similarly situated,

18 Plaintiff,

19 vs.

20 HERBER AIRCRAFT SERVICE, INC., a
21 California Corporation; and DOES 1
22 through 50, inclusive,

23 Defendants.

CASE NO.: **24STCV12247**

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

Hearing Date: February 24, 2026

Hearing Time: 10:30 a.m.

Judge: Hon. Carolyn B. Kuhl

Dept: SS-12

Action Filed: May 15, 2024

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 10:30 a.m. on February 24, 2026 in
3 Department 12 at the Spring Street Courthouse in the above entitled Court before the
4 Honorable Carolyn B. Kuhl, Plaintiff Joel Velez ("Plaintiff") will apply for an order:
5 (1) preliminarily approving the proposed settlement of this class action with Defendant
6 Herber Aircraft Service, Inc. ("Defendant"); (2) for settlement purposes only, conditionally
7 certifying the Class, which is comprised of "all individuals who are or previously were
8 employed by Defendant who were classified as non-exempt in the State of California at any
9 time during the Class Period but excluding those individuals who signed individual release
10 agreements"; (3) provisionally appointing Plaintiff as the representatives of the Class; (4)
11 provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP as Class
12 Counsel; (5) approving the form and method for providing class-wide notice; (6) directing
13 that notice of the proposed settlement be given to the class; (7) appointing Apex Class
14 Action LLC as the Administrator, and (8) scheduling a final approval hearing date that is
15 120 days from preliminary approval, to consider Plaintiff's motion for final approval of the
16 settlement and for approval of attorneys' fees, expenses and service award.

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

24 Respectfully submitted,

25 Dated: November 5, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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