

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

3 Kyle R. Nordrehaug (State Bar #205975)

4 Aparajit Bhowmik (State Bar #248066)

5 Piya Mukherjee (State Bar #274217)

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 similarly
17 situated,

18 Plaintiffs,

19 vs.

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

23 Defendants.

Case No. 24STCV12247

**NOTICE OF MOTION AND MOTION
FOR FINAL APPROVAL OF CLASS
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES, COSTS AND
SERVICE AWARD**

Hearing Date: September 16, 2026

Hearing Time: 10:30 a.m.

*[Hearing scheduled by Orders dated
February 20, 2026 and May 21, 2026]*

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 September 16, 2026, or as
3 soon thereafter as the matter can be heard, in Department SS-12 at the above entitled Court
4 before the Honorable Carolyn V. Kuhl, Plaintiff Joel Velez (“Plaintiff”) will move for an order
5 granting (1) Final Approval of the Class Action Settlement, including approval of the attorneys’
6 fees, costs and service award, and (2) Entry of the Final Approval Order and Judgment.

7 This motion is brought in accordance with the Orders dated February 20, 2026 and May
8 21, 2026, and California Rules of Court, Rule 3.769. This Motion will be based on this notice,
9 the accompanying points and authorities, the Declaration of Norman Blumenthal, the Class
10 Action and PAGA Settlement Agreement (the “Agreement”), the Declaration of Elizabeth
11 Botero Bravo (the Administrator), the Declaration of the Plaintiff, and the complete files and
12 records in this action.

13 Because Plaintiff and Defendant Herber Aircraft Service, Inc. (“Defendant”) have agreed
14 to the proposed class settlement and have met and conferred regarding the motion, this motion
15 is not opposed. There have been no objections submitted by the Class.

16 Respectfully submitted,

17 Dated: August 20, 2026

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

19 By: /s/ Kyle Nordrehaug
20 Kyle R. Nordrehaug, Esq.
21 Attorneys for Plaintiff
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