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Attorneys for Plaintiffs

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

ERIN JONES and MATTHEW SHACHNO,
individuals, and on behalf of other members
of the general public similarly situated,

Plaintiff,

vs.

MARRIOTT INTERNATIONAL, INC., as
unknown business entity; and DOES 1
through 100, inclusive,

Defendants.

Case No. 30-2021-01183306-CU-OE-CXC

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

Hearing Date: November 6, 2025

Hearing Time: 2:00 p.m.

*[Hearing scheduled by Order dated June 4,
2025]*

Judge: Hon. Melissa McCormick
Dept.: CX105

Action Filed: February 8, 2021

Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 2:00 p.m. on November 6, 2025, or as soon
3 thereafter as the matter can be heard, in Department CX105 at the above entitled Court before
4 the Honorable Melissa McCormick, Plaintiffs Erin Jones and Matthew Shachno (“Plaintiffs”)
5 will move for an order granting (1) Final Approval of the Class Action Settlement, including
6 approval of the attorneys’ fees, costs and service awards, and (2) Entry of the Final Approval
7 Order and Judgment.

8 This motion is brought in accordance with the Order dated June 4, 2025, and California
9 Rules of Court, Rule 3.769. This Motion will be based on this notice, the accompanying points
10 and authorities, the Declaration of Norman Blumenthal, the Declaration of Edwin Aiwarzian,
11 the Class Action and PAGA Settlement Agreement and the amendments thereto (collectively
12 the “Agreement”), the Declaration of Cassandra Polites (the Administrator), the Declarations
13 of the Plaintiffs, and the complete files and records in this action.

14 Because Plaintiffs and Defendant Marriott International, Inc. (“Defendant”) have agreed
15 to the proposed class settlement and have met and conferred regarding the motion, this motion
16 is not opposed. There have been no objections submitted by the Class.

17 Respectfully submitted,

18 Dated: October 13, 2025

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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