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16 Attorneys for Plaintiffs

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

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

23 Plaintiffs,

24 vs.

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

28 Defendants.

CASE NO.: **30-2021-01183306-CU-OE-CXC**

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

Hearing Date: April 11, 2024
Hearing Time: 2:00 p.m.
Reservation No. 74205686

Judge: Hon. Melissa McCormick
Dept.: CX104

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 April 11, 2024, or as soon
3 thereafter as the matter can be heard, in Department CX104 at the above entitled Court
4 before the Honorable Melissa McCormick, Plaintiffs Erin Jones and Matthew Shachno
5 (“Plaintiffs”) will apply for an order: (1) preliminarily approving the proposed settlement of
6 this class action with Defendant Marriott International, Inc. (“Defendant”) (and approving
7 the proposed PAGA settlement); (2) for settlement purposes only, conditionally certifying
8 the Class, which is comprised of “all individuals who are or have been employed by
9 Defendant Marriott International, Inc. at either the JW Marriott Anaheim or the Marriott
10 Marquis San Diego hotels in California as hourly, non-exempt employees during any portion
11 of the Class Period ” which is February 8, 2017 through the date of the Preliminary
12 Approval Order, or through an earlier date pursuant to Section 9 of the Agreement (defined
13 below); (3) provisionally appointing Plaintiffs as the representatives of the Class; (4)
14 provisionally appointing Blumenthal Nordrehaug Bhowmik De Blouw LLP and Lawyers for
15 Justice, PC as Class Counsel; (5) approving the form and method for providing class-wide
16 notice; (6) directing that notice of the proposed settlement be given to the class; (7)
17 appointing ILYM Group as Administrator, and (8) scheduling a final approval hearing date
18 to consider Plaintiffs’ motion for final approval of the settlement and for approval of
19 attorneys' fees, expenses and service payments.

20 This unopposed motion for preliminary approval of the class settlement is brought
21 pursuant to California Rules of Court, rule 3.769. Plaintiffs’ motion will be based on this
22 notice of motion and motion, the accompanying memorandum of points and authorities, the
23 Declaration of Kyle Nordrehaug, the Declaration of Brian J. St. John, the Class Action and
24 PAGA Settlement Agreement (“Agreement”) between the Parties, and the complete files and
25 records in this action. Because all parties have agreed to the proposed class settlement, this
26 motion is not opposed by Defendant.

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Respectfully submitted,

Dated: January 12, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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