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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN FRANCISCO

KALIYAH MARTIN, an individual, on behalf
of herself and on behalf of all persons similarly
situated,

Plaintiff,

vs.

BLEND LABS, INC. a Delaware Corporation;
BLEND OPERATIONS, INC., a Delaware
Corporation; BLEND TITLE INSURANCE
AGENCY, INC., a Delaware Corporation;
BLEND INSURANCE AGENCY, INC., a
Delaware Corporation; and DOES 1-50,
Inclusive;

Defendants.

Case No.: CGC-22-600420

**NOTICE OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION AND
PAGA SETTLEMENT**

Date: June 4, 2024
Time: 9:30 a.m.

Judge: Hon. Richard B. Ulmer, Jr.
Dept.: 302

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 9:30 a.m. on June 6, 2024, or as soon thereafter as the matter can be heard, in Department 302 of the above-entitled Court, before the Honorable Judge Richard B. Ulmer, Jr., Plaintiff KALIYAH MARTIN (“Plaintiff”) will apply for an order will apply for an order granting (1) Final Approval of the Class Action and PAGA Settlement, and (2) Entry of the Final Approval Order and Judgment.

This Motion is brought in accordance with the Preliminary Approval Order January 25, 2024, and California Rules of Court, rule 3.769. This Motion will be based on this notice, the accompanying points and authorities, the Stipulation of Settlement of Class and PAGA Action Claims and Release of Claims (hereinafter the “Agreement”), the Declaration of Shani O. Zakay, Esq., the Declaration of Jean-Claude Lapuyade, Esq., the Declaration of Madely Nava (the Settlement Administrator), the Declarations of the Plaintiff, and the complete files and records in this action.

Because all parties have agreed to the proposed class settlement and have met and conferred regarding the motion, this motion is not opposed by Defendant. To date, there have been no objections submitted by the Class.

Respectfully submitted,

Dated: May 9, 2024

JCL LAW FIRM, APC

By: 
Jean-Claude Lapuyade, Esq.
Attorneys for Plaintiffs