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Attorneys for Plaintiffs

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

MANUEL FRANCO and ALFONSO
GUZMAN, on behalf of themselves, on
behalf of all persons similarly situated,
and on behalf of the State of California as
a private attorney general,

Plaintiffs,

vs.

STATES LOGISTICS SERVICES, INC.,
a California Corporation; and DOES 1
through 50, inclusive,

Defendants.

CASE NO.: 30-2022-01239095-CU-OE-CXC

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

Hearing Date: November 8, 2024
Hearing Time: 1:30 p.m.

Judge: Hon. Lon Hurwitz
Dept.: CX103

Action Filed: July 6, 2021
Trial Date: Not set

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

2 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on November 8, 2024, or as
3 soon thereafter as the matter can be heard, in Department CX103 at the above entitled Court
4 before the Honorable Lon Hurwitz, Plaintiffs Manuel Franco and Alfonso Guzman
5 (“Plaintiffs”) will apply for an order: (1) preliminarily approving the proposed settlement of
6 this class action with Defendant States Logistics Services, Inc. (“Defendant”); (2) for
7 settlement purposes only, conditionally certifying the Class, which is comprised of “all
8 individuals who were employed by Defendant in the State of California and classified as a
9 non-exempt employee at any time during the Class Period”, which is May 2, 2020 to July 20,
10 2024; (3) provisionally appointing Plaintiffs as the representatives of the Class; (4)
11 provisionally appointing Norman B. Blumenthal, Kyle R. Nordrehaug, Aparajit Bhowmik,
12 Jeffrey S. Herman, Sergio J. Puche, Trevor G Moran of Blumenthal Nordrehaug Bhowmik
13 De Blouw LLP, Nazo Koulloukian of Koul Law Firm, and Sahag Majarian, II of Law
14 Offices of Sahag Majarian, II as Class Counsel; (5) approving the form and method for
15 providing class-wide notice; (6) directing that notice of the proposed settlement be given to
16 the class; (7) appointing ILYM Group, Inc. as Administrator; and (8) scheduling a final
17 approval hearing date for a date that is four months from preliminary approval to consider
18 Plaintiffs’ motion for final approval of the settlement and for approval of attorneys’ fees and
19 expenses.

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 Nazo Koulloukian, the Declaration of
24 Sahag Majarian , the Declarations of the Plaintiffs, the Class Action and PAGA Settlement
25 Agreement (“Agreement”) between the Parties, and the complete files and records in this
26 action. Because all parties have agreed to the proposed class settlement, this motion is not
27 opposed by Defendant.
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Respectfully submitted,

Dated: October 16, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

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