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Attorneys for Plaintiff KODY Walker

**SUPERIOR COURT OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO**

KODY WALKER, individually and on behalf of
all persons similarly situated and the State of
California,

Plaintiff,

v.

NAPROTEK, LLC A California Limited Liability
Company; Does 1 through 50, inclusive,

Defendants.

Case No. 25CV007274

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION TO APPROVE PRIVATE
ATTORNEYS GENERAL ACT
SETTLEMENT AND DISMISS CLASS
AND PAGA CLAIMS**

Date: October 23, 2026

Time: 9:00 A.M.

Dept.: 8B

Reservation No.: A-07274-001

Complaint Filed: March 26, 2025

Trial Date: TBD

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that at 9:00 am., on October 23, 2026, in Department 8B of the Sacramento County Superior Court, 813 6th Street, Sacramento, California 95814, Plaintiff Kody Walker (“Plaintiff”) will move the Court for an order as follows:

1. Finding that Plaintiff has exhausted administrative remedies under the Private Attorneys General Act (“PAGA”) and, as such, was authorized to enter into this settlement on behalf of the Labor and Workforce Development Agency;
2. Approving the \$49,605.00 PAGA Settlement Agreement, which is incorporated by reference as if stated here in full;
3. Approving the application for payment to Plaintiffs’ counsel of reasonable costs in the amount of \$6,776.77;
4. Approving the application for payment to Plaintiffs’ counsel of reasonable attorneys’ fees in the amount of \$17,361.75 (35% of Settlement Amount);
5. Approving ILYM Group, Inc. as the third-party administrator to administer the PAGA Settlement Agreement according to the terms of the settlement agreement, and approving the payment of \$4,250.00 to ILYM to administer the settlement;
6. Approving a PAGA Representative Enhancement Payment to Plaintiff in the Amount of \$5,000.00;
7. Approving PAGA penalty allocations set forth in the Settlement Agreement wherein the Gross Penalty Amount of approximately \$16,216.48 (following deductions for attorneys’ fees and costs, settlement administrator costs, Plaintiff’s enhancement payment, and service awards) shall be allocated to civil penalties pursuant to the allocation set forth in Labor Code section 2699(i), with \$10,540.71 being awarded to the State of California and \$5,675.77 being awarded to Aggrieved Employees.
8. Approving as to form and content the proposed Notice of PAGA Settlement (“PAGA Notice”), which provides Aggrieved Employees information regarding the settlement;

9. Approving the proposed procedures to notify, and deliver payment to, the Aggrieved Employees by first class mail;
10. Directing Defendant to collect Aggrieved Employee contact information for purposes of administering the settlement proceeds;
11. Directing that any residue from settlement checks that were not cashed within 180 days of issuance be distributed to the California State Controller Unclaimed Property Fund in that Aggrieved Employee's name;
12. Dismissing the PAGA claims with prejudice; and
13. Approving and adopting the Proposed Order, which is filed herewith and incorporated by reference.

This motion is being made pursuant to California Labor Code section 2699(1)(2), on the grounds that the proposed PAGA Settlement is fair, reasonable, and adequate and furthers the purpose behind the asserted California Labor Code statutes in deterring non-compliance. As a result, the PAGA Settlement should be approved by the Court. This motion will be based on the notice of motion, memorandum of points and authorities, the Declaration of Counsel for Plaintiff Kent L. Bradbury, Declaration of Plaintiff Kody Walker, exhibits, the record and files of this case, and any further oral or documentary evidence introduced at the hearing of this motion.

IMPORTANT NOTICE REGARDING HEARING ON MOTION:

Pursuant to Local Rule 1.06 (A), the court will make a tentative ruling on the merits of this matter by 2:00 p.m., the court day before the hearing. The complete text of the tentative rulings for the department may be downloaded off the court's website. If the party does not have online access, they may call the dedicated phone number for the department as referenced in the local telephone directory between the hours of 2:00 p.m. and 4:00 p.m. on the court day before the hearing and receive the tentative ruling. If you do not call the court and the opposing party by 4:00 p.m. the court day before the hearing, no hearing will be held.

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1 Dated: July 6, 2026

RICHARDSON EMPLOYMENT LAW

2 By: 
3 Kent L. Bradbury
4 Attorney for Plaintiff
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