

1 **AEGIS LAW FIRM, PC**
2 KASHIF HAQUE, State Bar No. 218672
3 SAMUEL A. WONG, State Bar No. 217104
4 JESSICA L. CAMPBELL, State Bar No. 280626
5 KRISTY R. CONNOLLY, State Bar No. 328477
6 9811 Irvine Center Drive, Suite 100
7 Irvine, California 92618
8 Telephone: (949) 379-6250
9 Facsimile: (949) 379-6251
10 Email: jcampbell@aegislawfirm.com
11 kconnolly@aegislawfirm.com

12 Attorneys for Plaintiff Richard R. Reyes, individually,
13 and on behalf of all others similarly situated.

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF FRESNO**

16 RICHARD R. REYES, individually and
17 on behalf of all others similarly situated,

18 Plaintiffs,

19 v.

20 NEXT GREEN WAVE, LLC; and DOES
21 1 through 20, inclusive,

22 Defendants.

Case No. 22CECG02474

Assigned for All Purposes to:
Judge Jonathan M. Skiles
Dept. 503

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION FOR APPROVAL OF
PAGA SETTLEMENT**

Date: June 25, 2025
Time: 3:30 p.m.
Dept. 503

1 **TO THE COURT, DEFENDANTS, AND THEIR ATTORNEYS OF RECORD:**

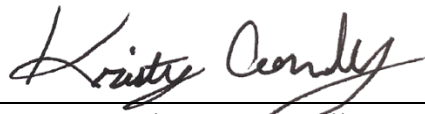
2 **PLEASE TAKE NOTICE** that on June 25, 2025 at 3:30 p.m., in Department 503 of the
3 Superior Court of the County of Fresno, located at 1130 “O” Street, Fresno, CA 93724, Plaintiff
4 Richard R. Reyes (“Plaintiff”) will and hereby does move this Court for an Order granting
5 approval of the Parties’ Private Attorneys General Act of 2004, California Labor Code § 2698 *et*
6 *seq.* (“PAGA”) representative action settlement.

7 This Motion will be based upon this Notice, the Memorandum of Points and Authorities,
8 the Declaration of Kristy R. Connolly, the Declaration of Richard R. Reyes, the Declaration of
9 Lisa Mullins for ILYM Group, Inc., and exhibits filed herewith, and any additional papers or
10 arguments submitted on or before the hearing on the Motion.

11
12 Dated: May 7, 2025

AEGIS LAW FIRM, PC

13
14 By _____


Kristy R. Connolly
Attorneys for Plaintiff Richard R. Reyes