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FARLEY LEWIS DOXEY, on behalf of themselves
and others similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SACRAMENTO

UDOKA NWEKE and FARLEY LEWIS
DOXEY, on behalf of themselves and all
others similarly situated, and the general
public,

Plaintiffs,

vs.

KERBEROS INTERNATIONAL, INC., a
Texas Corporation; and DOES 1 through 50,
inclusive,

Defendant.

Case No.: 23CV008209

CLASS ACTION

*Assigned for All Purposes to Hon. Lauri A.
Damrell, Dept. 22*

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

*[Filed concurrently with Memorandum of Points
and Authorities; Declaration of David
Keledjian; [Proposed] Order and [Proposed]
Judgment]*

Date: December 19, 2025

Time: 9:00 A.M.

Dept.: 22

Original Complaint Filed: September 8, 2023

First Amended Complaint Filed: November 16,
2023

Second Amended Complaint Filed: May 15, 2024

Trial Date: None Set

1 **TO THE COURT AND DEFENDANT AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on December 19, 2025, at 9:00 a.m. in Department 22 of the
3 Sacramento Superior Court, Gordon D. Schaber Superior Court, located at 720 9th Street,
4 Sacramento, CA 95814, Plaintiffs UDOKA NWEKE and FARLEY LEWIS DOXEY (“Plaintiffs”),
5 on behalf of themselves and other similarly situated employees of Defendant KERBEROS
6 INTERNATIONAL, INC. (“Defendant”) (hereinafter Plaintiffs and Defendant collectively
7 referred to as the “Parties”), will and hereby do move this Court pursuant to California Code of
8 Civil Procedure § 382 and California Rule of Court 3.769 for an order of final approval of the class
9 action settlement, which will accomplish the following: certify the class for settlement purposes
10 only; approve the class action settlement embodied in the Parties’ Joint Stipulation of Class Action
11 and PAGA Settlement and Release (“Settlement Agreement”) (“Settlement Agreement” or
12 “Settlement”); confirm Plaintiffs as Class Representatives; confirm the appointment of Class
13 Counsel; approve Class Counsel’s application for attorney’s fees and litigation costs; approve the
14 enhancement award to each Class Representative; and enter judgment approving the class action
15 settlement.

16 The grounds for this Motion, as set forth in the attached memorandum of points and
17 authorities and supporting declarations, are that this is a fair and reasonable settlement that benefits
18 the class and was the product of informed, non-collusive negotiations by parties who were
19 represented by experienced and able counsel. See *Dunk v. Ford Motor Co.*, 48 Cal. App. 4th 1794,
20 1802 (1996); Manual for Complex Litigation, (Second), § 30.44 (1985).

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1 Plaintiffs base this Motion on this Notice and the accompanying Memorandum of Points
2 and Authorities, the Declaration of David Keledjian and Karla Nava, the complete pleadings,
3 records, and files in the case, and such other further oral and documentary evidence which may be
4 submitted at or before the hearing on this Motion.

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6 Dated: November 25, 2025

Respectfully submitted,

7 D.LAW, INC.

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9 By 
10 David Keledjian
11 David Arakelyan
12 Attorneys for Plaintiffs UDOKA NWEKE,
13 FARLEY LEWIS DOXEY on behalf of
14 themselves and others similarly situated
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