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Attorney for Plaintiff
Kyle Roberts

SUPERIOR COURT OF CALIFORNIA
COUNTY OF TEHAMA

KYLE ROBERTS, on his own behalf and
all similarly situated individuals,

Plaintiff,

v.

PROPAK LOGISTICS, LLC; and DOES
1 to 100,

Defendants.

Case No.: 23CI-000324

CLASS ACTION

**PLAINTIFF KYLE ROBERTS'S NOTICE OF
MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF ADAM
ROSE; DECLARATION OF KYLE
ROBERTS; DECLARATION OF KELSEY
STERN; PROPOSED ORDER**

Date: January 20, 2025
Time: 8:30 a.m.
Dept.: 5

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on January 20, 2026, at 8:30 a.m. in Department 5 of the Tehama County Superior Court located at 1740 Walnut St., Red Bluff, CA 96080, Plaintiff Kyle Roberts ("Plaintiff"), will move the Court pursuant to Code of Civil Procedure section 382 and California Rule of Court 3.769 for an order:

- (1) Preliminarily approving the class action settlement reached between Plaintiff and Defendant, including granting preliminary approval of the following class: "All non-

1 exempt employees employed by Propak in California during the Class Period,” which
2 is the period from December 2, 2020, through December 31, 2024.

- 3 (2) Approving the Notice of Class Action Settlement and procedure to give notice; and
4 (3) Setting the final approval hearing.

5 Pursuant to Labor Code section 2699(s)(2), the Plaintiff also seeks preliminary approval
6 of the settlement’s PAGA allocation.

7 This Motion is based on the fact that this is a fair and reasonable settlement that benefits
8 the class and was the product of informed, non-collusive negotiations by the parties who were
9 represented by experienced and able counsel. *See Dunk v. Ford Motor Co.* (1996) 48 Cal. App.
10 4th 1794, 1802; Manual for Complex Litigation (Second) (1985) § 30.44. The proposed
11 settlement meets the standard for preliminary approval and is in the best interests of the class; the
12 proposed form of notice explains the settlement terms in a clear and straightforward manner; the
13 proposed procedures for notice provide the best practical notice to the class; and that Class
14 Members will have an opportunity to participate in and/or object to the settlement and/or opt-out
15 of the settlement. Defendant does not oppose the Motion.

16 The Motion is based on this Notice, and the exhibits thereto (including the Notice to Class
17 Members), the Memorandum of Points and Authorities, the Declaration of Adam Rose, the
18 Declaration of Kelsey Stern, the Declaration of Kyle Roberts, the pleadings, records and files in
19 the case, and arguments at the motion hearing.

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21 Date: December 24, 2025

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23 /s/ Adam Rose
24 Attorney for Plaintiff
25 Kyle Roberts
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