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9 Attorneys for Plaintiff KAITLYN ROJAS, on behalf of
10 herself, all similarly aggrieved current and former
11 employees of Defendant, the Proposed Class
12 and the State of California
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF YOLO

KAITLYN ROJAS, individually on behalf of
herself and all others similarly situated,
Plaintiffs,

v.

YOLO EATS, INC., a California Corporation;
and DOES 1-10,

Defendants.

Case No. CV2024-1256

CLASS ACTION

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

Complaint Filed: May 20, 2024
FAC Filed: August 14, 2024

Trial Date: TBA

Date: August 6, 2026
Time: 9:00 a.m.
Dept: 14

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on August 6, 2026 at 9:00 a.m., in Department 14
of the above entitled court, located at 1000 Main Street, Woodland, California, 95695, Plaintiff
Kaitlyn Rojas ("Plaintiff") will, and hereby does, move the Court for an Order for final approval
of the proposed **Class Action & PAGA Settlement Agreement (hereinafter "Settlement
Agreement," attached to the Declaration of Gary R. Basham ("Basham Decl.") as Exhibit
A)** entered into with Defendant Yolo Eats, Inc. ("Defendant") on September 18-19, 2025,

NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION & PAGA SETTLEMENT

Case No. CV2024-1256

1 including but not limited to the means of allocation and distribution of Class funds, and allocation
2 for penalties under PAGA. In particular, Plaintiff will, and hereby does, move the Court for an
3 Order and Judgment:

4 1. Granting final approval of the class action settlement described herein, and
5 as set forth in the Parties' Settlement Agreement, finding that the settlement is fair, reasonable
6 and adequate;

7 2. Certification of the proposed Class for settlement purposes only;

8 3. Granting final appointment of Plaintiff Kaitlyn Rojas to serve as Class
9 Representative;

10 4. Granting final appointment of Gary R. Basham at Basham Law Group as
11 class counsel;

12 5. Approving the settlement of the PAGA claim as set forth in the Parties'
13 Settlement Agreement in accordance with Labor Code section 2699(1)(2); and

14 6. Entering Judgment and permanently barring and enjoining all Class
15 Members who do not timely opt out from prosecuting against Defendant all individual and class
16 or collective claims released upon satisfaction of all payments and obligations as set forth in the
17 Settlement Agreement.

18 This Motion is made pursuant to California Rules of Court Rule 3.769, which
19 requires Court approval of the settlement of class actions, and on the grounds that the proposed
20 settlement is fair, reasonable, and adequate, and therefore should be finally approved. This
21 Motion is further made pursuant to Labor Code Section 2699(1), which requires Court approval
22 of the settlement of PAGA claims. This Motion is unopposed by Defendant.

23 This Motion is based upon this Notice, Motion, the accompanying memorandum
24 of points and authorities, the Settlement Agreement, the Declaration of proposed class counsel
25 Gary R. Basham, the Declaration of Amanda Howard of ILYM Group, Inc., Regarding Notice
26 and Settlement Administration, the [Proposed] Order and Judgment lodged with this Motion, all
27 other pleadings and papers filed in support of Plaintiff's Motion for Final Approval of Class
28 Action and PAGA Settlement,

1 all other pleadings and other records on file with the Court for this matter, and any such evidence
2 and argument as may be permitted by the Court at the hearing on this Motion.

3 Date: June 17, 2026

BASHAM LAW GROUP

4
5 By: 
6 GARY R. BASHAM

7 Attorneys for Plaintiff KAITLYN ROJAS, on behalf of
8 herself, all similarly aggrieved current and former
9 employees of Defendant, the Proposed Class and the
10 State of California

1 **PROOF OF SERVICE**

2 I, the undersigned declare:

3 I am employed in the County of Sacramento, State of California. I am over the
4 age of eighteen years and not a party to the within action; my business address is 13389 Folsom
5 Blvd., Suite 300 #339, Folsom, CA 95630.

6 On June 17, 2026, I caused the following to be served:

7 **PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF**
8 **CLASS ACTION & PAGA SETTLEMENT**

9 _____ by placing a true copy thereof enclosed in a sealed envelope with postage
10 thereon fully prepaid for deposit in the United States Post Office mail box, at
11 my business address shown above, following Basham Law Group's ordinary
business practices for the collection and processing of mail, of which I am
readily familiar, and addressed as set forth below.

12 _____ by depositing a true copy thereof enclosed in a sealed envelope with delivery
13 fees thereon fully prepaid in a box or other facility regularly maintained by
14 FedEx or delivering to an authorized courier or driver authorized by FedEx to
receive documents on the same date that it is placed at Basham Law Group for
collection, addressed as set forth below.

15 _____ by sending a copy by facsimile to the person(s) at the address(s) and facsimile
number(s) set forth below.

16 _____ by personal service to the person(s) at the address(s) set forth below.

17 ✓ _____ by email to the person(s) at the email address(s) set forth below.

18
19 **Attorneys for Defendant**

20 Trevor White (trevorwhite@kroghdecker.com)
21 Derek Decker (derekdecker@kroghdecker.com)
22 KROGH & DECKER LLP
555 Capitol Mall, Suite 700
Sacramento, CA 95814

23
24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct, and that this declaration was executed on June 17, 2026 at Folsom,
26 California.

27 

28 _____
Gary R. Basham