

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PRESTON KYLES, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

PAPA JOHN'S INTERNATIONAL, INC.,

Defendant.

Case No. 1:20-cv-07146

Judge: Hon. John Robert Blakey

**PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Plaintiff Preston Kyles respectfully moves this Court, pursuant to Fed. R. Civ. P. 23(e), for an order certifying the proposed Settlement Class for settlement purposes, preliminarily approving Plaintiff's class action settlement with Defendant Papa John's International, Inc., and approving of the proposed notice and directing its issuance. Plaintiff's motion is based on his accompanying memorandum of points and authorities, the declarations of J. Dominick Larry and Thomas R. Kayes, and the exhibits thereto, all filed contemporaneously herewith.

WHEREFORE, Plaintiff respectfully requests that this Court: (1) certify the proposed Settlement Class for settlement purposes only; (2) appoint Plaintiff as Settlement Class Representative for settlement purposes only; (3) appoint J. Dominick Larry of Nick Larry Law LLC and Thomas R. Kayes of Loevy + Loevy as Settlement Class Counsel; (4) preliminarily approve the proposed Settlement; (5) approve the form and methods of the proposed notice; (6) order the issuance of notice; and (7) grant such other relief as the Court deems reasonable and just.

Dated: December 12, 2025

Respectfully submitted,

PRESTON KYLES, individually and on
behalf of all others similarly situated,

s/ J. Dominick Larry

One of Plaintiff's Attorneys

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Proposed Settlement Class Counsel