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Attorneys for Plaintiff Gail Wilkerson, on behalf of herself, and all other similarly-situated employees

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN DIEGO

GAIL WILKERSON, on behalf of herself
and all other similarly-situated employees,

Plaintiff,

v.

INTUIT, INC., a Delaware Corporation; and
DOES 1 through 100, Inclusive,

Defendants.

Case No. 37-2020-00030371-CU-OE-CTL
ASSIGNED FOR ALL PURPOSES TO:
The Honorable Gregory W. Pollack
Department C-71

CLASS ACTION

**NOTICE OF MOTION AND
MOTION FOR ORDER GRANTING
PRELIMINARY APPROVAL OF
CLASS ACTION AND PAGA
SETTLEMENT**

Date: September 30, 2022

Time: 9:30 a.m.

Dept: C-71

Judge: Honorable Gregory W. Pollack

Reservation: 2501884

[IMAGED FILE]

Complaint filed: August 28, 2020

Trial date: Not set

1 PLEASE TAKE NOTICE, on September 30, 2022 at 9:30 a.m., or as soon as the matter
2 may be heard in Department C-71 of the above captioned court located at 330 W. Broadway,
3 San Diego, California, 92101, Honorable Gregory W. Pollack presiding, Plaintiff Gail
4 Wilkerson, on behalf of herself and the putative class, will move this Court for an Order:

5 1. Preliminarily approving the Class Action and Private Attorney Generals Act
6 Settlement as fair, adequate, and reasonable based upon the terms set forth in the Joint
7 Stipulation of Class and PAGA Representative Action Settlement and Release (“Settlement
8 Agreement”), and payment by Defendant Intuit, Inc. of the \$150,000 Total Settlement Amount;

9 2. Conditionally certifying the above-captioned case as a class action for
10 settlement purposes only;

11 3. Approving the Notice of Class Action Settlement be mailed via first class U.S.
12 Mail to all members of the Settlement Class advising them of the pendency of the Action, the
13 proposed Settlement, the manner and procedure for submitting requests for exclusion and
14 objections to the Settlement, of the automatic payment of their share of the Settlement funds
15 without the need to return a claim form, of the date set for the final approval hearing, and of
16 their right to appear at the time of the Final Approval hearing;

17 4. Appointing Cohelan Khoury & Singer and Davtyan Law Firm as Class Counsel;

18 5. Appointing Plaintiff Gail Wilkerson as Class Representative;

19 6. Appointing Phoenix Class Action Administration Solutions as the Settlement
20 Administrator to administer the Settlement of this matter as set forth in the Settlement
21 Agreement;

22 7. Setting a hearing date to consider final approval of the Settlement.

23 This motion is based on this Notice of Motion, Memorandum of Points and Authorities
24 in Support, Declarations of Class Counsel Jeff Geraci and Emil Davtyan, Declaration of Named
25 Plaintiff Gail Wilkerson, Declaration of Michael E. Moore on behalf of Phoenix Class Action
26 Administration Solutions, the Settlement Agreement and its exhibits, the [Proposed] Order

27 ///

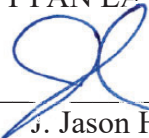
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1 Granting Preliminary Approval of Class Action Settlement, the Court's files in this matter, and
2 any other documents or evidence which the Court may consider at the hearing of this motion.
3

4 Respectfully submitted,

5 COHELAN KHOURY & SINGER
6 DAVTYAN LAW FIRM, INC.

7 Dated: March 29, 2022

8 By:  _____

J. Jason Hill, Esq.

9 Attorneys for Plaintiff GAIL WILKERSON
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