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and MONICA I. PAZMINO, individually and on behalf of  
all others similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF SANTA CLARA**

BENIYAM KEBEDE, ALAIN TSAI, and  
MONICA I. PAZMINO, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

WRIKE, INC.; and DOES 1 through 25,  
inclusive

Defendants.

Case No. 20CV366599

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Patricia M. Lucas  
Department 3

**CLASS ACTION**

**NOTICE OF MOTION AND MOTION FOR  
ORDER GRANTING FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT AND  
ENTERING JUDGMENT**

Date: May 4, 2022

Time: 1:30 p.m.

Dept: 3

Judge: Hon. Patricia M. Lucas

Complaint filed: May 13, 2020

Trial date: Not set

PLEASE TAKE NOTICE, on May 4, 2022 at 1:30 p.m., or as soon as the matter may be heard in Department 3 of the above-captioned court located at 191 North First Street, San Jose, California 95113, Honorable Patricia M. Lucas presiding, Plaintiffs Beniyam Kebede, Alain Tsai, and Monica I. Pazmino, on behalf of themselves and the putative class, will move this Court for an Order Granting Final Approval of Class Action Settlement and Entering Judgment as set forth in the fully-executed Joint Stipulation of Settlement and Release of Class Action filed with this Court on October 26, 2021 ("Settlement Agreement"). Plaintiffs move this Court to:

1. Finally adjudicate the Settlement is fair, reasonable, and adequate;
2. Direct distribution of Individual Settlement Payments by the Settlement Administrator to all Participating Class Members in accordance with the Settlement Agreement;
3. Approve and direct payment to Class Counsel for their attorneys' fees in the sum of \$666,666.00 and reimbursement of their litigation costs of \$10,657.85;
4. Approve and direct the Class Representative Service Payment of \$10,000.00 to Plaintiff Beniyam Kebede;
5. Approve and direct the Class Representative Service Payment of \$10,000.00 to Plaintiff Alain Tsai;
6. Approve and direct the Class Representative Service Payment of \$10,000.00 to Plaintiff Monica I. Pazmino;
7. Approve and direct the payment to Simpluris, Inc., the appointed Settlement Administrator, of \$5,500.00 for its fees and costs in administering the Settlement;
8. Approve the PAGA Payment to California's Labor and Workforce Development Agency of \$37,500.00 (75% of \$50,000.00); and,
9. Direct the Clerk of the Court to enter final judgment, and without affecting the finality of the final judgment, to reserve the Court's continuing jurisdiction over the Parties for the purposes of implementing, enforcing, or administering the terms of the Agreement.

This motion is made on the grounds that the proposed Settlement, preliminarily approved by this Court on December 6, 2021, is the product of arms'-length, good-faith negotiations, is fair and reasonable to the Class, and should now be finally approved, as more fully discussed in the

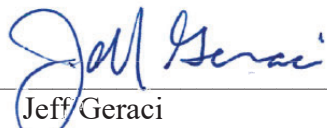
1 accompanying Memorandum in Support of Final Approval of Class Action Settlement and  
2 Entering Final Judgment.

3 This motion is based on this Notice of Motion, the Memorandum of Points and Authorities  
4 in Support, Declarations of Class Counsel Jeff Geraci and Jonathan M. Lebe, Declaration of  
5 Plaintiffs Beniyam Kebede, Alain Tsai, and Monica I. Pazmino filed October 26, 2021, Declaration  
6 of Evelin Reyes on behalf of Simpluris, Inc., the Settlement Agreement, the Notice of Class Action  
7 Settlement, the Order Granting Preliminary Approval of Class Action Settlement, the [Proposed]  
8 Order Granting Final Approval of Class Action Settlement and Entering Judgment, the Court's  
9 files in this matter, including but not limited to the Motion for Preliminary Approval of Class  
10 Action Settlement, and any other documents or evidence the Court may consider at the hearing.

11 Respectfully submitted,

12 LEBE LAW, APLC  
13 COHELAN KHOURY & SINGER

14 Dated: April 8, 2022

15 By:   
16 Jeff Geraci  
17 Attorneys for Plaintiff BENIYAM KEBEDE,  
18 ALAIN TSAI, and MONICA I. PAZMINO  
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