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Attorneys for Plaintiffs BENIYAM KEBEDE, ALAIN TSAI,
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 AN ORDER GRANTING
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: December 1, 2021

Time: 1:30 p.m.

Dept: 3

Judge: Hon. Patricia M. Lucas

Complaint filed: May 13, 2020

Trial date: Not set

1 PLEASE TAKE NOTICE, on December 1, 2021 at 1:30 p.m., or as soon as the matter may
2 be heard in Department 3 of the above-captioned court located at 191 North First Street, San Jose,
3 California 95113, Honorable Patricia M. Lucas presiding, Beniyam Kebede, Alain Tsai, and
4 Monica I. Pazmino, on behalf of themselves and 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 Stipulation
7 of Settlement and Release of Class Action (“Settlement Agreement”), and payment by Defendant
8 Wrike, Inc. of the \$2,000,000 Gross Settlement Amount;

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

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

17 4. Appointing Jonathan M. Lebe and Zachary Gershman of Lebe Law, APLC, and
18 Michael D. Singer and Jeff Geraci of Cohelan Khoury & Singer, as Class Counsel;

19 5. Appointing Plaintiffs Beniyam Kebede, Alain Tsai, and Monica I. Pazmino as Class
20 Representatives;

21 6. Appointing Simpluris, Inc. as the Settlement Administrator to administer the
22 Settlement of this matter as set forth in the Settlement Agreement;

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

24 This motion is based on this Notice of Motion, Memorandum of Points and Authorities, the
25 Declarations of Class Counsel Jeff Geraci and Jonathan M. Lebe, Plaintiffs Beniyam Kebede,
26 Alain Tsai, and Monica I. Pazmino, and Eric Springer for Simpluris, the Settlement Agreement,

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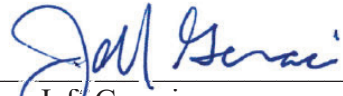
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1 Notice of Class Action Settlement, the [Proposed] Order Granting Preliminary Approval of Class
2 Action Settlement, and the Court's files in this matter.

3 Respectfully submitted,

4 LEBE LAW, APLC
5 COHELAN KHOURY & SINGER

6
7 Dated: October 26, 2021

By:  _____

8 Jeff. Geraci

9 Attorneys for Plaintiff BENIYAM KEBEDE,
10 ALAIN TSAI, and MONICA I. PAZMINO,
11 individually and on behalf of
12 others similarly situated
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