

1 [Counsel listed on next page]
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN FRANCISCO
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11 MATTHEW O'DONNELL, an individual, on
12 behalf of himself and on behalf of all persons
similarly situated,

13 Plaintiff,

14 vs.

15 OKTA, INC., a corporation; and Does 1
16 through 50, Inclusive,

17 Defendants.
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Case No. CGC-20-587665

**NOTICE OF MOTION AND MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT;
CONDITIONAL CERTIFICATION OF
SETTLEMENT CLASS; APPOINTMENT
OF CLASS REPRESENTATIVE, CLASS
COUNSEL AND SETTLEMENT
ADMINISTRATOR; APPROVAL OF
CLASS NOTICE PACKET; AND
SETTING OF FINAL APPROVAL
HEARING**

Date: September 28, 2021
Time: 9:30 a.m.
Judge: Hon. Ethan P. Schulman
Dept.: 302

Complaint filed: October 30, 2020
FAC filed: June 16, 2021
Trial date: None set

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25 Attorneys for Defendant Okta, Inc.

1 To the Clerk of the Court and all interested parties:

2 PLEASE TAKE NOTICE that on September 28, 2021, at 9:30 a.m., or as soon thereafter
3 as the matter may be heard, in Department 302 of this Court, located at 400 McAllister Street,
4 San Francisco, California 94102, before the Honorable Ethan P. Schulman, plaintiff Matthew
5 O'Donnell and defendant Okta, Inc. (collectively, the "parties") will and hereby do jointly move
6 the Court for preliminary approval of their class action settlement; conditional certification of the
7 settlement class; appointment of the class representative, class counsel and settlement
8 administrator; approval of the class notice packet; and setting of the final approval hearing.

9 This joint motion is made on the grounds that the parties have reached a fair and
10 reasonable settlement of Plaintiff's claims that will deliver substantial value to the settlement
11 class and the Labor and Workforce Development Agency (the "LWDA"), and the settlement is
12 deserving of approval by this Court.

13 In connection with this motion, the parties have given notice to the LWDA of the
14 settlement and this joint motion pursuant to California Labor Code section 2699(l)(2).

15 This Motion is brought in accordance with California Rules of Court, rule 3.769. This
16 motion is based upon this notice; the accompanying Memorandum in Support of Joint Motion for
17 Preliminary Approval of Class Action Settlement, Conditional Certification of Settlement Class,
18 Appointment of Class Representative, Class Counsel, and Settlement Administrator, Approval of
19 Class Notice Packet, and Setting of Final Approval Hearing; Declaration of Kyle Nordrehaug in
20 Support of Joint Motion for Approval of Class Action Settlement, Conditional Certification of
21 Settlement Class, Appointment of Class Representative, Class Counsel, and Settlement
22 Administrator, Approval of Class Notice Packet, and Setting of Final Approval Hearing; and
23 [Proposed] Order (1) Preliminarily Approving Proposed Settlement; (2) Conditionally Certifying
24 Settlement Class; (3) Appointing Class Representative, Class Counsel, and Settlement
25 Administrator; (4) Approving Class Notice Packet; and (5) Setting Hearing for Final Approval of
26 Settlement; the Court's record of this action; all matters of which the Court may take notice; and
27 such oral and documentary evidence received by the Court at the hearing on the motion.

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Respectfully submitted,

DATED: September 3, 2021

BLUMENTHAL NORDREHAUG
BHOWMIK DE BLOUW LLP

By: /s/ Kyle Nordrehaug

KYLE NORDREHAUG
Attorneys for Plaintiff

DATED: September 3, 2021

PAUL HASTINGS LLP

By: /s/ Zachary Hutton

ZACHARY P. HUTTON
Attorneys for Defendant Okta, Inc.