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16 SUPERIOR COURT OF THE STATE OF CALIFORNIA

17 COUNTY OF SAN FRANCISCO

18 MATTHEW O'DONNELL, an individual, on  
19 behalf of himself and on behalf of all persons  
20 similarly situated,

21 Plaintiff,

22 vs.

23 OKTA, INC., a corporation; and Does 1  
24 through 50, Inclusive,

25 Defendants.

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 30, 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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7 Attorneys for Defendant Okta, Inc.  
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1 To the Clerk of the Court and all interested parties:  
2 PLEASE TAKE NOTICE that on September 30, 2021, at 9:30 a.m., or as soon thereafter as the  
3 matter may be heard, in Department 302 of this Court, located at 400 McAllister Street, San  
4 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 8, 2021

BLUMENTHAL NORDREHAUG  
BHOWMIK DE BLOUW LLP

By: /s/ Kyle Nordrehaug

KYLE NORDREHAUG  
Attorneys for Plaintiff

DATED: September 8, 2021

PAUL HASTINGS LLP

By: /s/ Zachary Hutton

ZACHARY P. HUTTON  
Attorneys for Defendant Okta, Inc.