

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

**ERIC HIJUELOS, EMMA HIRZ, REMA
KHACHO, CHRISTOPHER LARA,
MADISON LATTNER, BRIAN MOJICA, and
KYLE NELSON** on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

DEGREE, INC. dba LATTICE,

Defendant.

Index No: 619179/2025

Hon. Francis Ricigliano, J.S.C.

**[PROPOSED] ORDER GRANTING PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY SETTLEMENT APPROVAL**

The above-entitled matter came before the Court on Plaintiffs' Motion for Preliminary Settlement Approval.

1. The Court grants preliminary approval of the settlement memorialized in the parties' Amended Settlement Agreement and Release (the "Agreement").
2. The Court finds that the proposed classes preliminarily satisfy the prerequisites of New York Civil Practice Law and Rules ("CPLR") §§ 901 and 902 and provisionally certifies the following classes under CPLR Article 9, for settlement purposes only:

California Class: All individuals employed by Lattice in California as an Account Executive from July 3, 2020 through September 1, 2025 and/or as a Sales Development Representative and/or Business Development Representative from July 3, 2020 through May 1, 2023.

New York Class: All individuals employed by Lattice in New York as an Account Executive from July 3, 2018 through September 1, 2025 and/or as a Sales Development Representative and/or Business Development Representative from July 3, 2018 through May 1, 2023.

3. The Court conditionally certifies the proposed collective pursuant to 29 U.S.C. § 216(b), for settlement purposes only:

Collective: All individuals employed by Lattice nationwide, except in California or New York, as an Account Executive from July 3, 2021 through September 1, 2025 and/or as a Sales Development Representative and/or Business Development Representative from July 3, 2021 through May 1, 2023.

4. The Court appoints Outten & Golden LLP as Class Counsel, for settlement purposes only.

5. The Court appoints CAC Services Group, LLC as the Settlement Administrator.

6. The Court approves the Amended Notices and directs their distribution pursuant to CPLR § 908.

7. The Final Approval Hearing will be held on _____, 2026 [*at least 132 days after the Preliminary Approval Order is entered*] at _____.

It is so ORDERED this ____ day of _____, 2026.

Hon. Francis Ricigliano
Supreme Court Justice