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MATT SEIBERT, ON BEHALF OF HIMSELF,
AND ALL OTHERS SIMILARLY SITUATED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MATT SEIBERT, an individual on behalf
of himself, and all others similarly
situated;

Plaintiff,

v.

SS&C TECHNOLOGIES, INC., a
Delaware corporation, INTRALINKS,
INC., a Delaware corporation, and DOES
1 to 100, inclusive;

Defendants.

Case No. 3:23-cv-00279-AMO

**[PROPOSED] ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS
AND PAGA ACTION SETTLEMENT**

Hearing Date: December 12, 2024

Time: 2:00 p.m.

Courtroom: 10, 19th Floor

Judge: Hon. Araceli Martinez-Olguin

[PROPOSED] ORDER

On December 12, 2024, the Court heard a motion by Plaintiff Matt Seibert (“**Plaintiff**”) for preliminary approval of a proposed class and PAGA action settlement (the “**Motion**”). The Court has considered Plaintiffs’ Motion, the Settlement Agreement and Stipulation (“Settlement” or “Settlement Agreement”), the proposed Class Notice, the supporting declarations from Plaintiff’s and Plaintiff’s counsel, and hereby finds and orders as follows:

1. The Court finds on a preliminary basis that the class and PAGA action settlement memorialized in the Settlement Agreement, filed with the Court, falls within the range of reasonableness and, therefore, preliminarily approves its terms as it meets the requirements for preliminary approval.
2. The Court conditionally certifies, for settlement purposes only, the following Classes:
 - a. “**Commissioned Employees Class**” - All current and former employees who worked for SS&C Technologies, Inc. (“**SS&C**”) or Intralinks, Inc. (“**Intralinks**”) in the State of California who were eligible to earn commissions at any time between October 21, 2018, through the date of preliminary settlement approval.
 - b. “**California Employees Class**” - All current and former employees who worked for SS&C or Intralinks in the State of California at any time between October 21, 2018, through the date of preliminary settlement approval.
 - c. “**Commissioned Aggrieved Employees**” - All current and former employees who worked for SS&C or Intralinks in the State of California who were eligible to earn commissions at any time between October 12, 2021, through the date of preliminary settlement approval.
 - d. “**California Aggrieved Employees**” - All current and former employees who worked for SS&C or Intralinks in the State of California at any time between October 12, 2021, through the date of preliminary settlement approval.
3. The Court finds that, for settlement purposes only, the requirements of 29 U.S.C. § 216, Federal Rule of Civil Procedure 23(a) and Federal Rule of Civil Procedure 23(b)(3) are

satisfied, with the exception of the manageability requirement of Rule 23(b)(3), which the Court need not address for purposes of settlement.

4. The Court appoints, for settlement purposes only, Matt Seibert as Class Representative.
5. The Court appoints, for settlement purposes only, Valles Law, P.C. as Class Counsel.
6. The Court appoints CPT Group as Settlement Administrator.
7. The Court approves, as to form and content, the Rule 23 Notice attached to the Settlement Agreement as Exhibit A. The Settlement Administrator is ordered to mail that document to the members of the Classes as provided in the Settlement Agreement.
8. Each Class Member will have sixty (60) days after the date on which the Settlement Administrator mails the Notice to submit an Exclusion Letter or to object to the Settlement, as described in the Settlement Agreement and the Notice.
9. The Court will conduct a Final Approval Hearing on _____, 2025, at _____ a.m./p.m., or as soon thereafter as the matter may be heard, to confirm the overall fairness of the settlement and to fix the amount of reasonable attorneys' fees and costs to Class Counsel and enhancement payment to the Class Representative. The Final Approval Hearing may be continued without further notice to members of the Classes. Class Counsel shall file their motion for reasonable attorneys' fees, costs, and the Class Representative payment sought in the Settlement, on or before _____, 2025. Class Counsel shall file their motion for final settlement approval on or before _____, 2025.

10. An implementation schedule is below:

<u>Event</u>	<u>Date</u>
Defendants to provide Class Member List to Settlement Administrator	December 27, 2024 (15 days after preliminary approval)
Settlement Administrator to mail Notice Packets	January 8, 2025 (10 days after receiving class member list)

Class Counsel to file Motion for Attorneys' Fees, Costs, and Class Representative Service Award	_____, 2025
Deadline to Request exclusion and/or Object to Settlement	March 10, 2025 (60 days after mailing of Notice Packets)
Plaintiff to file Motion for Final Settlement Approval	_____, 2025
Final Approval Hearing	_____, 2025

IT IS SO ORDERED.

Dated: _____, 2024

The Honorable Araceli Martinez-Olguin