

1 **AMENDMENT TO JOINT STIPULATION OF CLASS AND PAGA ACTION**

2 **SETTLEMENT AND RELEASE**

3 This Amendment to the Joint Stipulation of Class and PAGA Representative Action
4 Settlement and Release (“**Settlement**” or “**Settlement Agreement**”) is made and entered into
5 between Plaintiff Amy Reece (“Plaintiff” or “Class Representative”), individually and as
6 representative of the Class Members (as that terms is defined in the Settlement Agreement), and
7 Defendant WalkMe, Inc. (“**Defendant**”), with their approval and by their undersigned counsel of
8 record, pursuant to Section 85 of the Settlement Agreement, which states: “No amendment, change,
9 or modification to this Settlement Agreement will be valid unless in writing and signed, either by
10 the Parties or their counsel.”

11 The purpose of this Amendment is to modify Sections 65 of the Settlement Agreement to
12 clarify that “any Class Member may appear in person at the Final Approval Hearing to object to
13 the Settlement, with or without having submitted a written objection, and without providing prior
14 notice of intent to appear” and to amend section 95 of the Agreement to limit the section to just
15 state and federal courts. Accordingly, the Agreement shall be modified as follows:

16 *Settlement Agreement, Section 65:*

17 Section 65 of the Settlement Agreement is amended as follows:

18 **Objection Procedures.** To object to the Settlement Agreement, a Class Member must fax
19 or postmark a valid Notice of Objection to the Settlement Administrator on or before the
20 Response Deadline. The Notice of Objection must be signed by the Class Member and
21 contain all information required by this Settlement Agreement. ***Notwithstanding the foregoing, any Class Member may appear in person at the Final Approval Hearing to object to the Settlement, with or without having submitted a written objection, and without providing prior notice of intent to appear.*** At no time will any of the Parties or their counsel
22 seek to solicit or otherwise encourage Class Members to submit written objections to the
23 Settlement Agreement or appeal from the Order and/or Judgment. Class Counsel will not
24 represent Class Members with respect to any such objections to this Settlement. If a Class
25 Member submits both a valid Request for Exclusion and a Notice of Objection, the Notice
26 of Objection shall be void and the Class Member will be deemed to have opted out of
27 membership as a Qualified Class Member.

28 *Settlement Agreement, Section 95:*

 Section 95 of the Settlement Agreement is amended as follows:

Injunction Against Duplicative Claims. Upon Preliminary Approval of the Settlement Agreement, all Class Members shall be enjoined from filing, joining, or becoming a party, member or representative in any actions, claims, complaints, or proceedings in any state or

1 federal court on an individual, representative, collective or class action basis, ~~or with the~~
2 ~~California Department of Industrial Relations' Division of Labor Standards~~
3 ~~Enforcement ("DLSE") or the United States Department of Labor ("DOL"), or from~~
4 ~~initiating any other proceedings~~, regarding any of the Released Claims by Qualified
5 S&CS Settlement Class Members or Released Claims by Qualified ER Settlement Class
6 Members defined herein above any related pending actions, claims, complaints, or
7 proceedings in any state or federal court ~~or with the DLSE or DOL~~, shall be stayed until
8 the Class Members have had an opportunity to decide to participate, object or file a request
9 for exclusion from this Settlement.

10
11 Except as provided herein, all other provisions of the Agreement are unchanged and remain
12 in effect.

13 **IN WITNESS WHEREOF**, this Amendment to the Settlement Agreement is executed by
14 the Parties' respective counsel as of the day and year herein set forth.

15 **IT IS SO STIPULATED.**

16 DATED: December 11, 2025

By



Daniel Valles
Kayla M. Rathjen
VALLES LAW, P.C.
Attorneys for Plaintiff Amy Reece and the
Settlement Class

17 DATED: December 11, 2025

By



Chad Greeson
Daniel XuLi
LITTLER MENDELSON, P.C
Attorneys for Defendant WalkMe, Inc.