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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

MAYA AMERSON, an individual, on
behalf of herself and on behalf of all
persons similarly situated,

Plaintiffs,

vs.

REDDIT, INC., a Corporation; and
DOES 1 through 50, inclusive,

Defendants.

Lead Case No. **CGC-22-603466**

**DECLARATION OF MAYA AMERSON IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Hearing Date: May 23, 2024

Hearing Time: 1:30 p.m.

Judge: Hon. Daniel A. Flores

Dept.: 306

Action Filed: December 13, 2022

Trial Date: Not set

1 I, Maya Amerson, declare as follows:

2 1. I am over the age of eighteen, a Plaintiff and a proposed Class Representative in the
3 above-entitled matter. I submit this declaration in support of the Motion for Preliminary Approval
4 of Class Settlement and in support of my application for a Class Representative Service Payment.
5

6 2. I have personal knowledge of all the facts stated herein. I could and would competently
7 testify under oath to these facts in court if requested to do so.

8 3. I worked for defendant Reddit, Inc. ("Reddit") in California from October of 2018 to
9 September of 2022 and during that time period I was classified by Reddit as a non-exempt
10 employee.
11

12 4. I retained my attorneys who are experienced in both class action and representative
13 action litigation and claims against employers for violations of the California Labor Code. I have
14 no personal relationship or family ties to my attorneys or any officer of the Court. I am not aware
15 of having any actual or potential conflicts of interest with another class member in this case nor am
16 I aware of having any actual or potential conflicts of interest with Apex Class Action, the settlement
17 administrator. I am not aware of any other pending matter or action asserting claims that will be
18 extinguished or adversely affected by this settlement.
19

20 5. I decided to pursue this action and be a plaintiff/class representative because I felt
21 that my legal rights as an employee and others like me were violated. For example, I often did
22 not receive compliant meal and rest breaks which were often late, short or missed entirely.
23 Further, Defendant imposed "Pager Duty" and "Oncall" rotations. These work requirements
24 mandated that I be on call and ready to respond. This resulted in my meal and rest periods not
25 being entirely duty free. When these and other break violations occurred I did not receive all the
26 meal or rest break penalty payments I was entitled to.
27
28

1 6. I spoke to my attorneys several times and discussed how Reddit implemented
2 its company policies and procedures. I also assisted my attorneys in their investigation into my
3 claims by providing them documents and answering their questions. I reviewed the complaint
4 before it was filed and was given access to an electronic file sharing program that alerted me via
5 email when important documents were filed so that I could review them and keep up with the
6 developments in the case which I understood was one of my duties as a class representative. I
7 could also access court filings from this case on my attorney's law firm website.
8

9 7. Even though this action is in the process of settling, I was and remain prepared to
10 perform all the duties of a class representative. I understand that as a class representative I have
11 assumed a fiduciary responsibility to prosecute this class action on behalf of the absent class
12 members. I have understood that as a fiduciary, I have a duty to prosecute this action for the
13 benefit of the class members and surrender any right to compromise the group action for an
14 individual gain.
15

16 8. I understood that being a plaintiff/class representative in this case meant that I was
17 seeking damages not only for myself but also other individuals in California who make up the class.
18 I felt that these individuals were not aware of their labor law rights and even if they were they
19 would probably be apprehensive about speaking up or even simply because of the time, effort and
20 risk involved in filing a class action lawsuit.
21

22 9. I understood that being a part of this lawsuit involved risks. For example, my
23 attorneys explained to me that if the case went to trial and we lost, I could be held responsible to
24 pay for all or part of the attorney fees and costs paid by Reddit to defend this lawsuit. Also, I knew
25 there was a risk that future employers, if they ever find out about this lawsuit, could hold it against
26 me or downgrade me as a potential hire. Since I am a plaintiff in this case which is in the public
27 record, it would not be difficult for a future employer to become aware that I sued a former
28

1 employer for labor law violations. Ultimately I decided these risks were worth it and decided to
2 fight for my rights and the rights of others regardless of the risks, time and effort I spent on this
3 case.

4 10. During the lawsuit I stayed in touch with my attorneys by phone and email. I also
5 kept up to date on important developments by reviewing court filings that were made available to
6 me electronically as I described above.

7
8 11. A mediation took place on December 15, 2023 with Tripper Ortman, a well-
9 respected and experienced mediator of wage and hour class actions. Following the mediation the
10 parties were able to reach an agreement to settle the action based on a mediator's proposal. I
11 communicated with my attorneys regarding the terms of the settlement which was reached between
12 the parties and understood that I was representing absent class members and therefore wanted the
13 best possible result to be obtained for the class members and I believe a very positive result was in
14 fact achieved via settlement. I reviewed and signed the Memorandum of Understanding on January
15 22, 2024. When the final settlement agreement was ready I closely reviewed it and signed it on
16 April 9, 2024.

17
18 12. I have been actively involved with this lawsuit performing the duties described above.
19 Although I did not keep time records, I was in regular contact with my attorneys, reviewed court
20 filings and spent a significant amount of time on the issues presented during the lawsuit and in the
21 settlement process. I estimate that I spent approximately 30-40 hours working on this case up
22 until this point. I believe I have been diligent and have done what is expected of a plaintiff and a
23 proposed class representative to date, and will continue to do so. I have and always will maintain
24 the best interest of the class members.

25
26
27 13. My attorneys explained to me that the settlement process involves a two-step review
28 by the Court to determine whether the settlement is fair before approving the settlement. I know

1 this process also involves notifying all class members of the settlement terms and of their rights to
2 make a claim for their settlement share, to opt out of the settlement or to object to the settlement.

3 14. I believe I did the right thing by filing this case on behalf of the class members who,
4 subject to court approval, are in line to receive monetary payments as a result of this case and
5 settlement. This is money they may never have ever gotten if I did not pursue this action on their
6 behalf. I feel significant personal satisfaction to know that I played a role in the class members
7 being entitled to monetary payments as a result of the filing of this lawsuit. I also believe that the
8 requested Class Representative Service Payment of \$10,000 from the settlement is fair
9 compensation for the work I performed and the risks I undertook.
10

11 15. As part of the settlement it was necessary for me to sign a general release of claims I
12 may have against Reddit. I believe the Class Representative Service Payment I have requested
13 provides me with some compensation for this agreed release.
14

15 16. In light of all the time and effort I have spent on this case, the risk I undertook by
16 suing a former employer, the exposure to being responsible for paying for Reddit's costs in the
17 event we did not win the case, the reputational risk that future employers may hold this lawsuit
18 against me, the general release and in light of the size of the settlement, I believe the request for
19 \$10,000 as a Class Representative Service Payment is fair and reasonable.
20

21 I declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct.

23 Executed on Apr 28, 2024, at San Francisco, CA.
24 (city, state)

25 

Maya Amerson (Apr 28, 2024 12:59 PDT)

26 Maya Amerson
27
28