

1 **BLUMENTHAL NORDREHAUG BHOWMIK**
2 **DE BLOUW LLP**

3 Norman B. Blumenthal (State Bar #068687)

4 Kyle R. Nordrehaug (State Bar #205975)

5 Aparajit Bhowmik (State Bar #248066)

6 2255 Calle Clara

7 La Jolla, CA 92037

8 Telephone: (858)551-1223

9 Facsimile: (858) 551-1232

10 Email: Kyle@bamlawca.com

11 Website: www.bamlawca.com

12 Attorneys for Plaintiff

13
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **IN AND FOR THE COUNTY OF SAN FRANCISCO**
16

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

20 Plaintiffs,

21 vs.

22 REDDIT, INC., a Corporation; and DOES
23 1 through 50, inclusive,

24 Defendants.

CASE NO.: **CGC-22-603466**

**NOTICE OF MOTION AND
UNOPPOSED 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

25
26 **TO ALL THE PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

27 YOU ARE HEREBY NOTIFIED THAT at 1:30 p.m. on May 23, 2024 in
28 Department 306 at the above entitled Court before the Honorable Daniel A. Flores, Plaintiff

1 Maya Amerson (“Plaintiff”) will apply for an order: (1) preliminarily approving the
2 proposed settlement of this class action with Defendant Reddit, Inc. (“Defendant”); (2) for
3 settlement purposes only, conditionally certifying the Class, which is comprised of “all
4 individuals who are or previously were employed by Defendant in the State of California
5 during the Class Period that either (i) were classified as non-exempt, or (ii) whose positions
6 were classified as exempt during the Class Period but were re-classified as non-exempt
7 during the Class Period” of December 13, 2018 through March, 31, 2024; (3) provisionally
8 appointing Plaintiff as the representative of the Class; (4) provisionally appointing Norman
9 B. Blumenthal, Kyle R. Nordrehaug, and Aparajit Bhowmik of Blumenthal Nordrehaug
10 Bhowmik De Blouw LLP as Class Counsel; (5) approving the form and method for
11 providing class-wide notice; (6) directing that notice of the proposed settlement be given to
12 the class; (7) appointing Apex Class Action as Administrator, and (8) scheduling a final
13 approval hearing date, proposed for October 3, 2024 which is at least 120 days from
14 preliminary approval, to consider Plaintiff’s motion for final approval of the settlement and
15 for approval of attorneys’ fees and expenses.

16 This unopposed motion for preliminary approval of the class settlement is brought
17 pursuant to California Rules of Court, rule 3.769. Plaintiff’s motion will be based on this
18 notice of motion and motion, the accompanying memorandum of points and authorities, the
19 Declaration of Kyle Nordrehaug, the Declarations of the Plaintiff, the Class Action and
20 PAGA Settlement Agreement (“Agreement”) between the Parties, and the complete files and
21 records in this action. Because all Parties have agreed to the proposed class settlement, this
22 motion is not opposed by Defendant.

23 Respectfully submitted,

24 Dated: April 29, 2024

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

By: /s/ Kyle Nordrehaug
Kyle R. Nordrehaug, Esq.
Attorney for Plaintiff