

HUNTER PYLE, SBN 191125
KATIE FIESTER, SBN 301316
HUNTER PYLE LAW, PC
505 14th Street, Suite 600
Oakland CA 94612
Telephone: (510) 444-4400
Facsimile: (510) 444-4410
Emails: hunter@hunterpylelaw.com;
kfiester@hunterpylelaw.com

Attorneys for Plaintiff and the Putative Class

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

STUART AMBLER, on behalf of himself and
all others similarly situated;

Plaintiffs,

vs.

LINKEDIN CORPORATION, a Delaware
corporation doing business as LinkedIn, and
DOES 1 through 10, inclusive,

Defendants.

Case No.: 23CV049040

CLASS ACTION

[PROPOSED] ORDER GRANTING
PLAINTIFF STUART AMBLER'S MOTION
FOR FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION
SETTLEMENT; JUDGMENT

Reservation No.: 045894897288

Date: December 11, 2025
Time: 10:00 a.m.
Dept.: 18
Judge: Hon. Patrick McKinney

ORDER GRANTING PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS AND
REPRESENTATIVE ACTION SETTLEMENT AND AWARING ATTORNEYS' FEES, COSTS, AND
CLASS REPRESENTATIVE SERVICE PAYMENT; JUDGMENT

FILED
ALAMEDA COUNTY

DEC 11 2025

CLERK OF THE SUPERIOR COURT
By Pam Williams
Deputy

1 Plaintiff's Motion for Final Approval of Class and Representative Action Settlement
2 Agreement came before this Court on December 11, 2025 at 10:00 a.m. The above-captioned case is
3 a class and representative action lawsuit brought by Plaintiff Stuart Ambler ("Plaintiff") against
4 Defendant LinkedIn Corporation ("Defendant"). Plaintiff and Defendant are collectively referred to
5 here as the "Parties."

6 The Parties have reached a settlement and have submitted for this Court's approval the Class
7 and Representative Action Settlement Agreement (the "Settlement") that is attached to the
8 Declaration of Hunter Pyle in support of Final Approval as Exhibit 1.¹

9 The Court granted preliminary approval of the Settlement on June 26, 2025. The Court then
10 issued an Amended Order Granting Plaintiff's Motion for Preliminary Approval on July 9, 2025.

11 The Court's preliminary approval order provisionally certified the following Class for
12 settlement purposes only:

13 All current and former employees who are or were employed by Defendant at any time from
14 October 27, 2019 to February 27, 2025, and who worked in California during this time period
15 in Software Engineering job titles or job families, including but not limited to Software
Engineers, Senior Software Engineers, and/or Staff Software Engineers.

16 The Court ordered the Class Notice approved by the Court to be sent to Class Members.

17 Notice having been given as required by the Amended Order Granting Plaintiff's Motion for
18 Preliminary Approval, and having considered the Settlement and Plaintiff's Motion for Final
19 Approval, the Court hereby ORDERS, ADJUDGES AND DECREES AS FOLLOWS:

20 This Court has jurisdiction over the subject matter of the above-captioned action and over all
21 parties to the action, including all Class Members.

22 The Court finds that the Class defined above is properly certified for settlement purposes.

23 The Court finds that the Class Notice provided to Class Members conforms with the
24 requirements of California Code of Civil Procedure section 382, California Civil Code section 1781,
25 California Rules of Court 3.766 and 3.769, the California and United States Constitutions, and other
26 applicable law, and constitutes the best notice practicable under the circumstances; was reasonably
27 calculated, under the circumstances, to apprise Class Members of the pendency of the Action, and

28 ¹ All capitalized terms herein have the same meanings as those in the Settlement.

1 their right to exclude themselves from or object to the Settlement and to appear at the hearing on final
2 approval; was reasonable and constituted due, adequate, and sufficient notice to all persons entitled to
3 receive notice; and met all applicable requirements of due process, and any other applicable rules or
4 law.

5 The Court finds that the Settlement was entered into in good faith, that the Settlement is fair,
6 reasonable and adequate, and that the Settlement satisfies the standards and applicable requirements
7 for final approval of a class action settlement under California law, including the provisions of
8 California Code of Civil Procedure section 382 and California Rule of Court 3.769.

9 Zero Class Members have objected to the terms of the Settlement.

10 Three Class Members have opted out of the Settlement.

11 Upon entry of this Order, compensation to Participating Class Members shall be effectuated
12 pursuant to the terms of the Settlement.

13 The Court hereby finally approves the appointment of Hunter Pyle and Katie Fiester of Hunter
14 Pyle Law, PC as Class Counsel.

15 The Court hereby finally approves the appointment of Plaintiff Stuart Ambler as Class
16 Representative.

17 In recognition of Plaintiff's efforts on behalf of the Class, the Court hereby approves the
18 payment of a Class Representative Service Award to Plaintiff Stuart Ambler in the amount of
19 \$10,000.00, which he will receive in addition to any recovery he may receive under the Settlement.

20 The Court hereby approves the payment of \$30,597.00 to Simpluris, Inc. ("Simpluris"), for
21 the costs of administering the Settlement.

22 The Court hereby approves Legal Aid at Work and California CASA Association (Court
23 Appointed Special Advocates) as the *cy pres* beneficiaries which will each receive 50% of any
24 uncashed checks issued pursuant to the Settlement.

25 The Court hereby approves the payment to Class Counsel of attorneys' fees in the amount of
26 \$450,000.00 and litigation costs in the amount of \$20,544.93. The hourly rates and hours requested
27 by Class Counsel are reasonable.
28

1 Ten percent (10%) of the attorneys' fees awarded, which amounts to \$45,000.00, shall be held
2 by Simpluris until completion of the distribution process and court approval of a final accounting.
3 Plaintiff shall submit a proposed order releasing these fees at the time that Plaintiff files a Post-
4 Distribution Accounting.

5 Upon Final Approval of the Settlement, Plaintiff and the Participating Class Members, by
6 operation of this Order and Judgment, will have compromised, settled, discharged, and released the
7 Released Class Claims against Defendant and the Released Parties, and are bound by the provisions
8 of the Settlement. Additionally, all Aggrieved Employees will be bound by the PAGA Release as set
9 forth in the Settlement. The State's claims for civil penalties covered by the PAGA Release are also
10 extinguished as provided by the terms of the Settlement.

11 The Settlement and this Final Approval Order and Judgment are binding on, and have *res*
12 *judicata* and preclusive effect in, all pending and future lawsuits or other proceedings that encompass
13 the claims released by the Settlement.

14 The Settlement, and any proceedings undertaken pursuant thereto, are not, and should not in
15 any event be offered, received, or construed as evidence of, a presumption, concession, or an
16 admission of liability or non-liability as to any issue.

17 Simpluris is to execute the distribution of proceeds pursuant to the terms of this Agreement.
18 Upon completion of administration of the Settlement, the Parties shall file a declaration setting forth
19 that Settlement payments have been paid and that the terms of the Settlement have been completed.

20 The Court shall hold a compliance hearing on October 7, 2026, at 1:30 p.m. in Department
21 18. No later than five court days prior to that hearing, Class Counsel shall file a final report and
22 declaration regarding distribution, together with a proposed amended judgment pursuant to California
23 Code of Civil Procedure section 384.

24 This Judgment is intended to be a final disposition of the class action and representative
25 claims in the above-captioned Action and is intended to be immediately applicable.

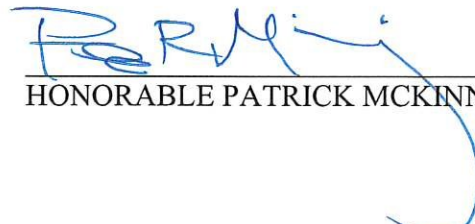
26 Pursuant to California Code of Civil Procedure Section 664.6 and California Rules of Court,
27 Rule 3.769(h), the Court shall retain jurisdiction of this action, the Parties, Participating Class
28

1 Members, and the Aggrieved Employees, as to all matters concerning the interpretation,
2 administration, implementation, consummation, and enforcement of this Settlement.

3 Judgment is hereby entered.

4
5 **IT IS SO ORDERED.**

6 Dated: December 11, 2025


HONORABLE PATRICK MCKINNEY