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7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10
11 CHRISTOPHER JAMES, et al., individually
12 and on behalf of all others similarly situated,
Plaintiffs,

13 v.

14 UBER TECHNOLOGIES, INC.,
15 Defendant.

CASE NO. 19-cv-06462-EMC

**NOTICE OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENT; MEMORANDUM OF
POINTS AND AUTHORITIES IN SUPPORT
THEREOF**

Hearing Date: March 24, 2022

Hearing Time: 1:30 pm

Courtroom: 5

Judge: Judge Edward Chen

NOTICE OF MOTION AND MOTION

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on March 24, 2022, at 1:30 p.m., in Courtroom 5 of this Court, located at 450 Golden Gate Avenue, 17th Floor, San Francisco, California, Plaintiffs Christopher James, Spencer Verhines, and Kent Hassell, individually and on behalf of all others similarly situated, will, and hereby do, move the Court pursuant to Federal Rule of Civil Procedure 23 and 29 U.S.C. § 216(b) for an order:

- (1) Preliminarily approving the Settlement Agreement between Defendant Uber Technologies, Inc. and Plaintiffs (attached as Exhibit 1 to the Declaration of Shannon Liss-Riordan, filed concurrently herewith), on the grounds that its terms are sufficiently fair, reasonable, and adequate for notice to be issued to the settlement class;
- (2) Certifying the proposed settlement class for settlement purposes only, pursuant to Federal Rule of Civil Procedure 23(c);
- (3) Approving the form and content of the proposed class notice and notice plan (Exhibits B, D, F & G to the Settlement Agreement);
- (4) Appointing Lichten & Liss-Riordan, P.C. to represent the settlement class as class counsel;
- (5) Appointing Simpluris as Settlement Administrator;
- (6) Scheduling a hearing regarding final approval of the proposed settlement, Class Counsel's request for attorneys' fees and costs, and enhancement payments to the Named Plaintiffs; and
- (7) Granting such other and further relief as may be appropriate.

This Motion is based on this Notice of Motion and Motion; the Memorandum of Points and Authorities below; the Declaration of Shannon Liss-Riordan filed concurrently herewith; all supporting exhibits filed herewith; all other pleadings and papers filed in this action; and any argument or evidence that may be presented at or prior to the hearing in this matter.

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