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Rick Keiner and the Class*

9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **OAKLAND DIVISION**

12 In re Lyft, Inc. Securities Litigation

Lead Case No.: 4:19-cv-02690-HSG

13 This document relates to:

**Lead Plaintiff's Notice of Motion,  
Unopposed Motion for Preliminary  
Approval of Settlement, and Memorandum  
of Points and Authorities in Support  
Thereof**

14 ALL ACTIONS

15  
16  
17 **Date: Oct. 13, 2022**  
18 **Time: 2:00 p.m.**  
19 **Courtroom: 2, 4th Floor**

20 **Hon. Haywood S. Gilliam, Jr.**  
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Find this Motion for Summary Judgment of Summary Judgment

1 **NOTICE OF MOTION AND UNOPPOSED MOTION**

2 **TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD**

3 PLEASE TAKE NOTICE that on October 13, 2022, at 2:00 p.m., or as soon as counsel  
4 may be heard before the Honorable Haywood S. Gilliam, Jr. United States District Judge, at the  
5 United States District Court, Northern District of California, Oakland Courthouse, Courtroom 2,  
6 4th floor, Oakland California, Lead Plaintiff Rick Keiner (“Keiner” or “Lead Plaintiff”), will and  
7 does hereby move for an order: (1) preliminarily approving the proposed settlement of this Action;  
8 (2) approving the form and manner of giving notice of the proposed settlement to the Class; and  
9 (3) scheduling a hearing before the Court to determine whether the proposed settlement, and Lead  
10 Counsel’s application for an award of attorneys’ fees and reimbursement of Litigation Expenses,  
11 should be granted final approval.

12 The grounds for this motion are that the proposed settlement is well within the range of  
13 what could be found to be fair, reasonable, and adequate so that notice of its terms may be  
14 disseminated to members of the Class and a hearing for final approval of the proposed settlement  
15 scheduled.

16 This motion is supported by the following memorandum of points and authorities in  
17 support thereof, and the Stipulation of Settlement (“Settlement Agreement” or “Stipulation”) dated  
18 June 8, 2022, and exhibits thereto which embody the terms of the proposed settlement between the  
19 parties, submitted herewith, and such other and further representations as may be made by Counsel  
20 at any hearing on this matter.<sup>1</sup>

21 **STATEMENT OF ISSUES TO BE DECIDED**

22 1. Whether the proposed settlement of this action for the sum of \$25,000,000 is within  
23 the range of fairness, reasonableness, and adequacy to warrant the Court’s preliminary approval  
24 and the dissemination of notice of its terms to members of the Class.

25 2. Whether the proposed form of settlement notice and proof of claim and release form  
26 and the manner for dissemination to the members of the Class should be approved.

27 \_\_\_\_\_  
28 <sup>1</sup> Unless otherwise indicated, capitalized terms shall have their meaning as defined in the  
Stipulation.

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