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8 *Attorneys for Defendant*
9 *Otonomo Inc.*

ELECTRONICALLY
FILED

Superior Court of California,
County of San Francisco

05/13/2022
Clerk of the Court
BY: EDNALEEN ALEGRE
Deputy Clerk

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12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **FOR THE COUNTY OF SAN FRANCISCO**

14 SAMAN MOLLAEI, individually and on behalf
of all others similarly situated,

15 Plaintiff,

16 v.

17 OTONOMO INC., a Delaware Corporation,

18 Defendant.
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Case No.: CGC22599118

**DEFENDANT OTONOMO INC.'S
NOTICE OF FILING OF NOTICE OF
REMOVAL**

Complaint Filed: April 11, 2022

1 **TO THE CLERK OF THE ABOVE-TITLED COURT, ALL PARTIES, AND**
2 **THEIR ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that on May 13, 2022, Defendant Otonomo Inc. in the above-
4 captioned action removed this action to the United States District Court for the Northern District
5 of California, by filing a Notice of Removal in that court. A true and correct copy of the Notice
6 of Removal and all documents attached thereto is attached hereto as **Exhibit A**. The filing of this
7 Notice effects removal of this action to federal court.

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10 DATED: May 13, 2022

LATHAM & WATKINS LLP

11 By: /s/ Melanie M. Blunschi

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EXHIBIT A

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 8 *Otonomo Inc.*
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10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12

13 SAMAN MOLLAEI, individually and on
 14 behalf of all others similarly situated,
 15 **Plaintiff,**
 16 v.
 17 OTONOMO INC., a Delaware Corporation,
 18 **Defendant.**
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Case No. 3:22-cv-02854

**DEFENDANT OTONOMO INC.'S
 NOTICE OF REMOVAL**

Removed from San Francisco Superior Court
 Complaint Filed: April 11, 2022

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1 **TO THE COURT, CLERK, PLAINTIFF, AND COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT**, Defendant Otonomo Inc. (“Otonomo”), through
3 undersigned counsel, hereby removes the above-captioned action—with reservation of all defenses
4 and rights—from the Superior Court of the State of California for the City and County of San
5 Francisco to the United States District Court for the Northern District of California, pursuant to
6 the Class Action Fairness Act (“CAFA”) and 28 U.S.C. §§ 1332(d), 1441, 1446, and 1453. The
7 grounds for removal are as follows:

8 **I. PROCEDURAL BACKGROUND**

9 1. On April 15, 2022, Otonomo was served with the Complaint and Summons for the
10 action filed in the Superior Court of the State of California, City and County of San Francisco,
11 entitled *Saman Mollaei, individually and on behalf of all others similarly situated, v. Otonomo Inc.*
12 *a Delaware Corporation*, Case No. CGC22599118. A copy of the Complaint is attached hereto as
13 **Exhibit A**. A copy of the Summons is attached hereto as **Exhibit B**. Copies of the Notice of
14 Service of Process are attached hereto as **Exhibit C**.

15 2. Pursuant to 28 U.S.C. § 1446(a), copies of all additional process, pleadings, and
16 orders served on Defendant in San Francisco County Superior Court No. CGC22599118 are
17 attached hereto as **Exhibit D**.

18 3. This Notice of Removal is filed within thirty days of Otonomo’s receipt of the
19 Summons and Complaint. *See* 28 U.S.C. § 1446(b); *see also* **Ex. C**.

20 **II. THIS COURT HAS DIVERSITY JURISDICTION PURSUANT TO THE CLASS**
21 **ACTION FAIRNESS ACT**

22 4. Plaintiff purports to represent a class defined as:

23 All California residents who own or lease a vehicle and whose GPS data
24 has been collected by Otonomo. (Compl. ¶ 21.)

25 5. This case is removable, and this Court has original jurisdiction over this action
26 pursuant to CAFA and 28 U.S.C. §§ 1332(d), 1441, and 1453, because (A) this case is a putative
27 class action with more than 100 members in the proposed class; (B) there is minimal diversity,
28 because (i) Plaintiff and Otonomo are citizens of different states, and alternatively and in addition,

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