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9 *Attorneys for Plaintiffs*

10 **SUPERIOR COURT OF CALIFORNIA**  
11 **COUNTY OF SAN MATEO**  
12 **UNLIMITED CIVIL**

13 DAVID WALKER, MELISSA ROSS, and  
14 BENJAMIN WILSON, individually and as  
representatives of the Class,

15 Plaintiffs,

16 v.

17 INFLECTION RISK SOLUTIONS, LLC,

18 Defendant.

**Electronically**  
**FILED**  
by Superior Court of California, County of San Mateo  
ON 4/19/2024  
By /s/ Haley Correa  
Deputy Clerk

Case No.: 22-CIV-02954

**PLAINTIFFS' NOTICE OF  
MOTION & MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Assigned for All Purposes to Hon. V.  
Raymond Swope

Date: November 4, 2024

Time: 3:00 p.m.

Department: 23

**NO ORAL ARGUMENT  
REQUESTED**

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Case No.: 22-CIV-02954

1 PLEASE TAKE NOTICE that Plaintiffs David Walker, Melissa Clark (nèe Ross),  
2 and Benjamin Wilson (“Plaintiffs”) respectfully request that the Court: (1) preliminarily  
3 approve the proposed class action settlement with Defendant Inflection Risk Solutions, LLC  
4 (“Defendant”), (2) certify the Settlement Class for settlement purposes only, (3) appoint  
5 Named Plaintiffs as Class Representatives, (4) appoint Named Plaintiffs’ counsel as Class  
6 Counsel, and (6) direct notice to be distributed to the Settlement Class. Defendant does not  
7 oppose the relief sought in this motion.

8 Plaintiffs’ Motion is based on this Notice of Motion and Motion, the Memorandum  
9 of Points & Authorities in Support thereof, the Declaration of E. Michelle Drake, and the  
10 Parties’ Settlement Agreement and Exhibits thereto, the pleadings, files, and records on file  
11 herein.

12 The parties request that the Court rule on this Motion prior to the November 4, 2024  
13 date, and do not request oral argument to be held.

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15 BERGER MONTAGUE PC

16 Date: April 19, 2024

17 /s/E. Michelle Drake  
18 E. Michelle Drake (*pro hac vice*)

19 ATTORNEYS FOR PLAINTIFFS  
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