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12 *Melgoza, as trustee of the Smilka Melgoza*  
13 *Trust U/A DTD 04/08/2014, Rediet Tilahun,*  
14 *Tony Ray Nelson, Rickey E. Butler, Alan L.*  
15 *Dukes, Donald R. Allen and Shawn B.*  
16 *Dandridge, and Class Counsel for the Class*

17 [Additional counsel on signature page.]

18 **UNITED STATES DISTRICT COURT**  
19 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
20 **WESTERN DIVISION**

21 IN RE SNAP INC. SECURITIES  
22 LITIGATION

Case No. 2:17-cv-03679-SVW-AGR

**CLASS ACTION**

23 This Document Relates To: All Actions.

**CLASS REPRESENTATIVES’  
NOTICE OF MOTION AND MOTION  
FOR APPROVAL OF DISTRIBUTION  
PLAN**

24 Date: April 25, 2022  
25 Time: 1:30 p.m.  
26 Courtroom: 10A, 10<sup>th</sup> Floor  
27 Judge: Hon. Stephen V. Wilson

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on April 25, 2022, at 1:30 p.m., or as soon thereafter  
3 as the matter may be heard, in the courtroom of the Honorable Stephen V. Wilson, United  
4 States District Judge for the Central District of California, located at the First Street  
5 Courthouse, 350 W. 1st Street, 10th Floor, Courtroom 10A, Los Angeles, California,  
6 90012, Court-appointed Class Representatives Smilka Melgoza, as trustee of the Smilka  
7 Melgoza Trust U/A DTD 04/08/2014, Rediet Tilahun, Tony Ray Nelson, Rickey E.  
8 Butler, Alan L. Dukes, Donald R. Allen, and Shawn B. Dandridge (collectively, “Class  
9 Representatives”), by and through the undersigned attorneys, and on behalf of the Court-  
10 certified Class, will and hereby do move the Court for an order pursuant to Rule 23 of the  
11 Federal Rules of Civil Procedure which will, *inter alia*: (i) approve the administrative  
12 determinations of the Court-authorized Claims Administrator, JND Legal Administration  
13 (“JND”), accepting and rejecting Claims submitted in connection with the Settlement  
14 reached in the above-captioned Action as set forth in the Declaration of Luiggy Segura in  
15 Support of Class Representatives’ Motion for Approval of Distribution Plan (“Segura  
16 Declaration”) filed herewith;<sup>1</sup> (ii) approve payment of \$98,623.60 from the Settlement  
17 Fund to JND for the balance of its outstanding fees and expenses and for the fees and  
18 expenses to be incurred in conducting the Initial Distribution of the Net Settlement Fund;  
19 (iii) direct the Initial Distribution of the Net Settlement Fund to Claimants whose Claims  
20 are accepted by JND as valid and approved by the Court (“Authorized Claimants”) in  
21 accordance with the Distribution Plan set forth in the Segura Declaration, while  
22 maintaining a Reserve for any contingencies that may arise; (iv) direct that distribution  
23 checks issued in the Initial Distribution state that the check must be negotiated within  
24 ninety (90) days after the issue date; (v) direct that Authorized Claimants will forfeit all  
25 recovery from the Settlement if they fail to cash their distribution checks in a timely  
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27 \_\_\_\_\_  
28 <sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in  
the Segura Declaration and in the Stipulation and Agreement of Settlement dated  
March 20, 2020 (“Stipulation”). ECF No. 368-3.

1 manner; (vi) approve the recommended plan for re-distribution and/or contribution of any  
2 funds remaining in the Net Settlement Fund following the Initial Distribution; (vii) release  
3 claims related to the administration process; and (viii) authorize the destruction of Claims  
4 and supporting documents as set forth in the Segura Declaration.

5 This motion is based on this Notice of Motion and Motion, the accompanying filed  
6 Memorandum of Points and Authorities (“Memorandum”), the Segura Declaration and  
7 exhibits attached thereto, the [Proposed] Order Approving Distribution Plan (“Class  
8 Distribution Order”), and the pleadings and records on file in this Action.

9 As set forth in the Segura Declaration, there are currently 26 Claimants with  
10 outstanding requests for Court review of JND’s administrative determination with respect  
11 to their Claims (“Disputing Claimants”). Upon the filing of this motion, Class Counsel  
12 will send each Disputing Claimant a copy of this motion, the Memorandum, the Segura  
13 Declaration, Exhibit D to the Segura Declaration along with the supporting documentation  
14 that relates to the Disputing Claimant’s Claim, and the proposed Class Distribution Order.  
15 Class Counsel will inform each Disputing Claimant that they do not need to take any  
16 further action to have the Court consider their dispute; however, if the Disputing Claimant  
17 wishes to make an additional submission, they should direct it to Your Honor’s attention  
18 with a copy to Class Counsel by no later than April 4, 2022. If any additional  
19 submission(s) is made, Class Counsel will submit a response by April 11, 2022 addressing  
20 such submission(s).

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1 Pursuant to Local Rule 7-3, and as set forth in the Parties’ Stipulation, Class  
2 Counsel has provided Defendants’ Counsel with advance notice of this motion.  
3 Defendants do not oppose this motion.<sup>2</sup>

4 Dated: March 18, 2022

Respectfully submitted,

5 **KESSLER TOPAZ**  
6 **MELTZER & CHECK, LLP**

7 */s/ Jennifer L. Joost*

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*Allen and Shawn B. Dandridge, and Class Counsel*

24 <sup>2</sup> Defendants have no role in or responsibility for the administration of the Settlement  
25 or processing of Claims, including determinations as to the validity of Claims or the  
26 distribution of the Net Settlement Fund. See Stipulation, ¶ 19. (“None of the Defendants,  
27 nor any of the other Released Defendants’ Parties, shall have any involvement in or any  
28 responsibility, authority, or liability whatsoever for the selection of the Claims  
Administrator, the Plan of Allocation, the administration of the Settlement, the Claims  
process, or disbursement of the Net Settlement Fund, and shall have no liability  
whatsoever to any person or entity, including, but not limited to, Class Representatives,  
any other Class Members or Class Counsel in connection with the foregoing.”).

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